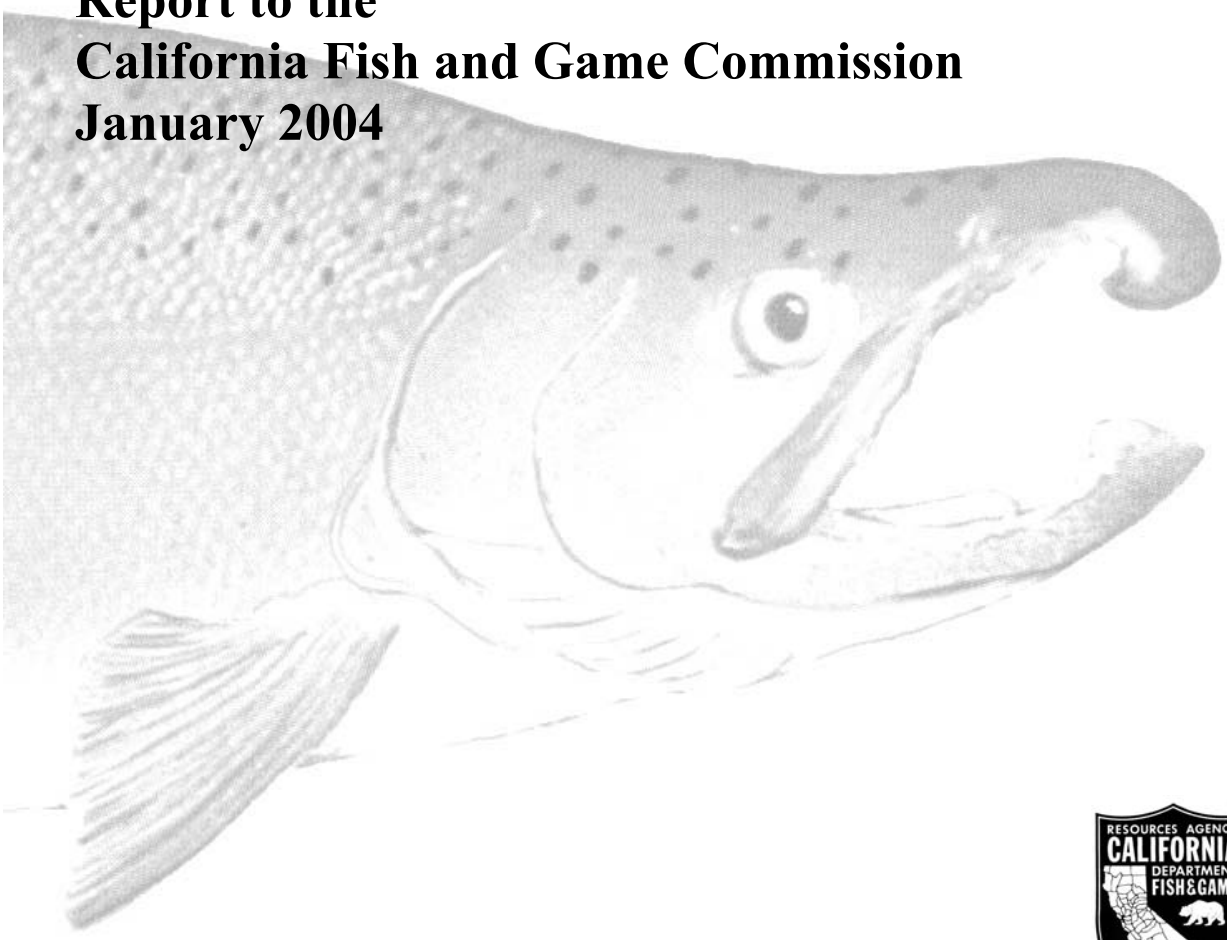
RESPONSE TO COMMENTS ON THE

DRAFT RECOVERY STRATEGY FOR CALIFORNIA COHO SALMON (*ONCORHYNCHUS KISUTCH*)

Report to the
California Fish and Game Commission
January 2004



California Department of Fish and Game
The Resources Agency
State of California

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Prepared by
The California Department of Fish and Game

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Response to Comments

The Department of Fish and Game (Department) released the public review draft of the Coho Salmon Recovery Strategy (Recovery Strategy) on November 7, 2003. Public meetings to receive comments followed on November 17 in Santa Rosa, November 19 in Yreka, and November 20 in Eureka. Public comments were due and received by the Department on November 28. Approximately 173 people attended the public meetings and a total of 79 people submitted written and/or verbal comments during this period. Comments pertinent to the public review draft of the Recovery Strategy are addressed as follows in Appendix J-1. Comments received that did not pertain to the Recovery Strategy, such as whether or not the species warranted listing throughout a portion or all of its range in California, were not included. The Commission found that coho salmon warranted listing south of San Francisco in December 1995 and north of San Francisco in August 2002. Where multiple comments identified the same issue or concern, the Department grouped or paraphrased these comments to avoid redundancy.

In response to the comments, substantial changes have been made to Chapter 4 (Recovery Goals and Delisting Criteria), Section 7.24 (Timber Management Alternatives), and Appendix F (Economic Analysis). These revised sections are provided in their entirety as Attachments 1, 2, and 3, respectively.

APPENDIX J-1: RESPONSE TO COMMENTS ON THE PUBLIC REVIEW DRAFT OF THE COHO SALMON RECOVERY STRATEGY.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		GENERAL	
1	Mr. Darin Claiborne Yreka Mr. Raymond Hall Mendocino County Planning and Building Services Dept. Ukiah Ms. Chrissie Ishida Copco Lake Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento Mr. Ralph Modine Supervisor, 4th District Trinity County Board of Supervisors Weaverville Ms. Kathleen Morgan Monitoring Coordinator Gualala River Watershed Council Ms. Pamela J. Nicolai General Manager Marin Municipal Water District Mr. Aaron Peters Chairman Quartz Valley Indian Reservation	The three week comment period was too short for such a comprehensive recovery strategy.	Although it was not a requirement of law, the Department made the Recovery Strategy available for public review for 21 days in an effort to give stakeholders an opportunity to review and comment on the strategy prior to its formal consideration at the Commission hearing in February 2004. The Commission will accept comments on the Recovery Strategy up to and including the date of the hearing.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Fort Jones Gary, Karen, & Amanda Rainey Horse Creek Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville Mr. Tom Wetter Lake Shastina		
2	Darin and Laura Claiborne Yreka Mr. Robert Zatkin (via phone)	More public meetings should have been required.	The Department scheduled three public meetings (Santa Rosa, Eureka, and Yreka) to receive comments on the Recovery Strategy. While these meetings are not required under the statute governing the recovery strategy process, the Department felt it was important to provide an opportunity for public comment. A formal public hearing on the Commission's consideration of the Recovery Strategy is required by statute and is scheduled for February 2004 in Sacramento.
3	Mr. Walter Epp Oakland	The purpose of this process must be to ensure the survival and health of salmon, not to delay or avoid listing. Likewise, action to protect salmon must begin immediately. This process must not be a device for endless study delaying real action until it's too late.	The purpose of the Recovery Strategy is to recover the species, as stated in the CRT's mission statement on page 1-4.
4	Mr. Richard Alves United Anglers of California San Jose Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and	The Department and the CRT are to be commended for the hard work they have put into developing the Recovery Strategy in a very short timeframe. This was no small accomplishment and, if implemented, the Recovery Strategy would go a long way toward recovering coho salmon in California.	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Sonoma County Water Agency Walnut Creek Mr. Reid Bryson Mattole Salmon Group Petrolia Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz Mr. Brock Dolman Occidental Mr. Walter Epp Oakland Mr. Brian Hines Secretary Trout Unlimited of California Ms. Danielle Lindler Executive Director Klamath Alliance for Resources and Environment Mr. Richard Ridenhour McKinleyville Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway		
5	Mr. Craig Bell	The recovery strategy has a full suite of	Comment noted.

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	Occidental	recommendations, protection and restoration; there is balance in the strategy.	
6	Mr. Richard Alves United Anglers of California San Jose Mr. Larry Moss Smith River Alliance Trinidad Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville Mr. Brian Woolsey Hydrologist/Geomorphologist Samoa	Supports adoption of the recovery strategy by the Commission.	Comment noted.
7	Mr. Larry Moss Smith River Alliance Trinidad Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	The Department has basically done a good job capturing most of the suggested material from the CRT.	Comment noted.
8	Mr. Peter Parker Forest Landowners of California Sacramento Mr. John Williams Environmental Resource Solutions Inc. Santa Rosa Sacramento	We feel that Forest Landowners of California suggestions were largely disregarded and our efforts turned to our distinct disadvantage.	The Department appreciates the participation and efforts of the forest landowners on the CRT. Members representing forest landowners on the CRT provided information to that team and the information was used by the group at large in preparing the CRT's recommendations to the Department. In addition, members representing forest landowners participated in the negotiation of language for CRT

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			recommendations to the Department, many of which were approved by consensus. The Department believes the Recovery Strategy benefited from this participation and input.
9	Mr. Peter Parker Forest Landowners of California Sacramento	It is painfully clear that those owning forestland have been singled out as the only party at the table to be subjected to a massive new rules package; we are an easy target.	The Department does not believe it has singled out forest landowners. The CRT addressed the issue of timberland management as a range-wide issue and it was the only subject area on which the CRT was unable to provide the Department with consensus recommendations. At the request of the Commission, the Department has presented a range of options relative to timberland management. The alternatives range from regulatory to non-regulatory in approach. The Commission has yet to make a final decision as to what should be included in the strategy relative to timberland management.
10	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	The Draft Recovery Strategy has numerous regulatory actions suggested that did not receive a consensus vote from the Recovery Team. The Department added recommendations throughout the document, which are outright or quasi-regulatory, those recommendations need to be removed from the draft strategy or changed to reflect a cooperative approach, rather than a regulatory approach. There is ample apportionment of regulatory obligations when you look at the sixteen range-wide Enforcement Recommendations then couple that with the abundant enforcement and regulatory recommendations scattered throughout the range-wide and watershed specific recommendations.	FGC § 2114 states that "the recovery strategy itself shall have no regulatory significance, shall not be considered to be a regulation for any purpose, including the rulemaking provisions of Chapter 3.5 (commencing with Section 11340) of Division 3 of Title 2 of the Government Code, and is not a regulatory action or document." The issue of timberland management was the only subject area which the CRT was unable to provide the Department with consensus recommendations. Therefore, at the request of the Commission, the Department has presented a range of alternatives for timberland management. The approaches range from regulatory to nonregulatory. The Commission has yet to make a decision on what should be included in the Recovery Strategy relative to timberland management.

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			Enforcement of existing laws is an element of the Recovery Strategy that everyone on the CRT, including landowners, agreed was important and desirable.
11	Mr. Bob Anderson United Winegrowers Santa Rosa Mr. Patrick Higgins Consulting Fisheries Biologist Arcata Mr. Felice Pace Klamath Forest Alliance Klamath Glen Mr. Doug Smith Humboldt Watershed Council Arcata	The Draft Strategy lacks a focused, strategic approach to recovery.	Comment noted.
12	Mr. Richard Alves United Anglers of California San Jose	The greatest threat to the program, which the plan did not address, is where water supplies will be found to prevent the coho situation from getting worse until provisions of the plan begin to have an effect.	Many range-wide tasks address planning for adequate water supplies (e.g., RW I-C-01 et seq., RE I-D-02); in addition, specific watershed tasks speak to this issue (e.g., TR-HU-01).
13	Mr. Peter Ribar Campbell Timberland Management Fort Bragg	The recovery strategy needs to explain how the recommendations are essential for coho salmon recovery.	All recommendations in the Recovery Strategy were deemed necessary by either the CRT or SSRT, for the purposes of delisting or restoring viable fisheries. The Department evaluated each recommendation and concurred. Further, the recommendations were developed in light of the six recovery goals, and corresponding criteria, described in Chapter 4. Recommendations were evaluated and ranked as to their relative value in recovery. Those ranks are included in each Implementation table (range-wide, SONCC and CCC Coho ESUs in Chapter 9 and

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			Shasta Valley and Scott River in Chapter 10).
14	Mr. Tom Hofweber Supervising Planner County of Humboldt Eureka	Currently updating general plan and will consider the recommendations within our jurisdiction; they are largely consistent with the comments and concerns we have received from the public.	Comment noted.
15	Mr. Darrel Sweet President California Cattlemen's Association Livermore	More than 60% of coho salmon habitat is privately owned. The most affected by the recovery strategy are private landowners.	The Recovery Strategy acknowledges that coho salmon recovery is dependent upon the role of private lands. The Recovery Strategy seeks to achieve species conservation in ways which are consistent with private property rights and which incorporate maximum use of public lands. See Role of Public Lands (Section 5.1; page 5-1). The Recovery Strategy emphasizes cooperation and voluntary incentives.
16	Mr. Wesley Anderson Humboldt-Del Norte Cattlemen's Association Mr. Bernard F. Bush Director of Regulatory Affairs Simpson Resource Company Korbel Ms. Sally French Land owner, FLC Board Member Buckeye Conservancy Vettersburg Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	The recovery strategy does not acknowledge or consider the efforts of landowners to date. Numerous landowner presentations detailing voluntary efforts were largely disregarded. The Recovery Strategy needs to give more recognition of good things happening in the watersheds by landowners.	The Recovery Strategy was prepared in compliance with information requirements set forth in Fish and Game Code (FGC) § 2109, and it acknowledges throughout the importance of a cooperative, voluntary approach with private landowners. The CRT report to the Department (available online through the Department website) contains a list of voluntary efforts of landowners that was compiled by members of the CRT. The Recovery Strategy has been amended to include a reference to this list.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Mr. Sean O'Day Yager/Van Duzen Environmental Stewards Fortuna Mr. Peter Parker Forest Landowners of California Sacramento Mr. Peter Ribar Campbell Timberland Management Fort Bragg Mr. Mike Strunk Sonoma County Farm Bureau Sebastopol Mr. Darrel Sweet President California Cattlemen's Association Livermore Mr. John Williams Environmental Resource Solutions Inc. Santa Rosa		
17	Mr. Wesley Anderson Humboldt-Del Norte Cattlemen's Association Mr. Al Gerhard Petaluma	There is not enough recognition of current agricultural, ranching, and timber practices that are protective of coho salmon habitat.	A statement that current agricultural practices have improved was added to Chapter 3 (Threats). Members representing agriculture, ranching, and forestry on the two recovery teams provided both general and specific information regarding current agricultural, ranching, and timber practices. This information was considered when recommendations to the Department were developed by the teams. To the extent new studies were provided, they must be evaluated in the context of the entire body of literature as the recovery effort proceeds.

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18	Mr. Denver Nelson Eureka	There has been no increase in returning coho numbers as result of Federal and State listing actions, restoration dollars spent, curtailment of fishing, and limited resource extraction. The fundamental problem with the entire salmon restoration effort is that there is no convincing data to show that past restoration efforts have been at all effective.	Localized increases in returning coho salmon have been documented in association with some restoration efforts, such as barrier removal (Morrison Gulch). Monitoring efforts on salmonid restoration efforts are being undertaken by the Department.
19	Mr. Felice Pace Klamath Forest Alliance Klamath Glen	Good intentions have failed to stop the decline. Need more focus and less 'kitchen sink', better science, better riparian protection, enforcement of water codes.	Comment noted.
20	Mr. Norman Dolan Santa Rosa	What is important to me is not the "cost of saving the Coho Salmon" but the repair of our streams and the sustained enforcement of regulations/laws that are needed. The focus of the state hearings should be on stopping the stonewalling of efforts to repair our streams. A specific timeline for counties and the state to provide money and manpower are needed now.	The range-wide recommendations that address enforcement of existing laws begin on page 9-23.
21	Mr. Kent Stromsmoe Forestry Monitoring Project	Please note that the Forestry Monitoring Project supports and endorses the Comments of the Klamath Forest Alliance on California Department of Fish and Game's Draft Recovery Strategy for Coho Salmon, and asks that those comments be considered as though the Forestry Monitoring Project had signed them directly.	Support noted.
22	Mr. William Davis Attorney Redding	The Recovery Strategy should be reviewed by the Governor's Office, industry, and working communities before it is approved—it appears to conflict with the Governor's recent Executive Order. Supports the comments submitted by Linda Falasco.	This comment appears to refer to Executive Order S-2-03, which requires, among other things and with certain exceptions, that state agencies cease processing any proposed regulatory action, including emergency regulations, for further review for a period not to exceed 180 days. It also requires each agency to assess and identify any present issuance, utilization, enforcement or attempt at enforcement of any guideline, criterion, bulletin, manual, instruction, order or standard of general application which has not been adopted as a regulation in potential violation of

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			Government Code section 11340.5(a) and submit its findings to the Office of Administrative Law and the Governor's Legal Affairs Secretary. This Executive Order does not apply to the Recovery Strategy. FGC § 2114 states that "the recovery strategy itself shall have no regulatory significance, shall not be considered to be a regulation for any purpose, including the rulemaking provisions of Chapter 3.5 (commencing with Section 11340) of Division 3 of Title 2 of the Government Code, and is not a regulatory action or document." Support noted.
23	Mr. Dave Hillemeier Fisheries Program Manager Yurok Tribe Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	Recommend attaching the document prepared by the facilitator of the CRT as an appendix or as a stand-alone document, public document.	The document prepared by the facilitator of the CRT is available to the public as a stand-alone document as it is not a document of the Department or the Commission.
24	Mr. Matt Goldsworthy Aquatic Biologist Mendocino Redwood Company Fort Bragg Mr. Mike Jani Mendocino Redwood Company Ukiah	Cannot find anywhere in the Public Review Draft where HCPs or NCCPs are addressed. Need to clearly articulate that the State supports HCPs and NCCPs as a strategy for property management. Further, the strategy should encourage or provide incentives to landowners that develop Habitat Conservation Plans and Natural Community Conservation Plans to conserve coho salmon habitat.	The Department believes HCPs have the potential to contribute to coho salmon recovery. However, HCPs are a component of the federal ESA, and the State cannot unilaterally pursue or encourage HCPs with landowners. The Department has participated with NOAA Fisheries on HCPs with landowners where coho salmon are at issue. The Department encourages welcomes the opportunity to continue to participate in HCPs. The Department also encourages the Natural Community Conservation Planning (NCCP) (FGC §§2800-2835) process in recovering coho salmon.

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			NCCP is a state mechanism for broad conservation and management of multiple species and their habitat. This process is founded on the voluntary participation of counties, cities, and landowners.
25	Mr. Harry Vaughn Eel River Salmon Restoration Program Miranda	The focus must be on all fish species, a drawback of your current approach of a single species , coho salmon restoration plan. We must get beyond single species approaches and strive for holistic watershed and resource management that includes people in the equation of fisheries resource restoration	The statutory authority under which this recovery strategy was prepared calls for a "single species" plan; however, the watershed approach taken to prepare the strategy should help to ameliorate this short-coming.
26	Mr. Bernard F. Bush Director of Regulatory Affairs Simpson Resource Company Korbel	Reformat the Public Review Draft on less regulation, give accurate population measures, emphasize a 'find it and fix it' approach to problems on a case by case basis.	The Recovery Strategy reflects a balance between regulatory and non-regulatory actions. The Department believes that much can be done through non-regulatory means (see Chapter 5). Where accurate information on coho salmon is available, the data were used in various evaluations (also see 2001 Status Review). Where information is wanting, the Department believes the proposed assessment and monitoring effort will gather necessary information on coho salmon populations (see Chapter 5). The Recovery Strategy, in part, summarizes issues that have been identified and need to be addressed (also see Status Review). The various scales of recovery (i.e., ESU, watershed recovery units, HSAs, streams and rivers) are the means of specifying solutions and further investigation into needs of coho salmon at more and more specific levels.
27	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	Public Review Draft ignores physical processes and watershed management.	Various recommendations in this document address physical processes (e.g., mass-wasting and sediment transport). In addition, the document is arranged by watersheds and addresses management of watersheds as a whole.
28	Mr. Wesley Anderson Humboldt-Del Norte Counties	Politics over science pervades the Public Review Draft.	The Recovery Strategy used the best available science and notes those areas that need more

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	Cattlemen's Association Loleta Mr. Patrick Higgins Consulting Fisheries Biologist Arcata Mr. Felice Pace Klamath Forest Alliance Klamath Glen Mr. Dick Shopit Etna		research and monitoring.
29	Mr. Richard Gienger Sierra Club Salmon and Steelhead Coalition Whitethorn Mr. Felice Pace Klamath Forest Alliance Klamath Glen	The Department knows what needs to be done but does not have the political will to do it. The Draft Strategy will result in the status quo. The will of the Department to achieve this recovery needs to be more dramatically expressed.	Comment noted.
30	Ms. Vivian Helliwell Pacific Coast Federation of Fishermen's Associations, Kneeland	Supports the comments of Mr. Moss and Mr. Weseloh.	Comment noted.
31	Mr. Felice Pace Klamath Forest Alliance Klamath Glen	Endorses the comments of Mr. Higgins. Passion will help save coho salmon.	Comment noted.
32	Mr. Felice Pace Klamath Forest Alliance Klamath Glen	Using this document, the easy things will be done and the hard things will be deferred.	Comment noted.
33	Mr. Jeff Fowle Siskiyou County Farm Bureau Etna	The need for listing coho is based on the actions of all land managers, public, private and federal. Recovery cannot occur overnight. It will be necessary to plan the	Comment noted.

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		work and then work the plan.	
34	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	The recovery strategy should evaluate the status of coho within watersheds and focus on impact assessment at the individual watershed level. Recovery recommendations need to be realistic and not aimed at restoring some "mythical" or "pristine" condition. This is not needed to achieve recovery. For example, is it really necessary for all culverts to pass LWD for recovery? Recommendations need to focus on significant impacts, not on everything that might affect fish.	Coho salmon status and watershed assessments were the basis for the Recovery Strategy. During development of the watershed recommendations, watershed summaries were written by the Department and provided to the CRT for its consideration and information. These summaries included the available data the Department had on coho salmon, their habitat, and watershed assessments in these watersheds. The CRT used these summaries as a starting point for watershed discussions. The information in the summaries was further augmented by information provided by individual CRT members and/or their experts. The recommendations are based on what is needed for recovery and are focused on the most significant effects in each watershed.
35	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	Water storage projects and potential modifications in their operations were not adequately addressed in the Strategy. DFG agreed (per Director Hight's mandate) to evaluate the **"**identification of desirable modifications of operations for water storage projects that would benefit coho salmon and its habitat" as per the "Petitioners Resolution". DFG should provide recommendations to address existing water storage projects, including but not limited to, changes in water management to benefit coho and providing fish passage at existing facilities. Dam removal is only addressed as "feasibility studies" and should be DFG recommendations in many instances.	The Department looks forward to working with members of the CRT and with California Trout in the ensuing years on issues of water storage and project modifications.
36	Ms. Pamela Nicolai Marin Municipal Water District Mr. Thomas J. Weseloh	Many of the recommendations use the phrases "encourage" and "support." These terms need to be defined in the final recovery plan, especially "encourage," as they can be interpreted in many ways	Such phraseology was developed by the CRT, used in its recommendations to the Department, and is reflected in the Recovery Strategy recommendations (Chapters 7 and 8). The Department's interpretation of

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	Northcoast Manager California Trout McKinleyville	and could have a variety of implementation strategies (i.e., voluntary, financial, or regulatory). What is meant by these terms? The language in the Implementation chapter should be used to replace "encourage" elsewhere in the document.	the intent of this language is reflected in the implementation table (Chapter 9).
37	Mr. Don L. Neubacher Superintendent National Park Service Point Reyes	While many of the recommendations are appropriate, they do not seem to be filtered back through the rest of the process. The list of recommendations is a laundry list that has not been fully evaluated and cannot be easily tracked	Recovery teams representing diverse interests and perspectives assisted the Department in developing the recovery strategy in a short statutory time-frame. To the extent the process of implementing the Recovery Strategy needs to be refined or otherwise addressed, the Department strives to do soon an annual basis.
38	Mr. Aaron Peters Chairman Quartz Valley Indian Reservation Fort Jones	The restoration of coho populations and fisheries is of interest to Tribal members. All species of salmon, including coho, have historical and traditional significance to Indian People. The declining coho populations are a sign of larger environmental problems such as water quality, quantity, and loss of habitat. We are excited by the recovery of this indicator species and of the benefits to other species.	Comment noted.
39	Mr. Bernard F. Bush Director of Regulatory Affairs Simpson Resource Company Korbel	Private landowners have offered numerous documents and information stating that coho salmon have increased in the past few years. The Strategy does not include this information, and therefore, is not based on the best available scientific data.	The Recovery Strategy is based on the best available scientific data. The Status Review of California Coho Salmon North of San Francisco, A Report to the California Fish and Game Commission, April 2002, provides the best available data on coho populations. The Department has also considered new scientific data that the Department has received to date. It has been reviewed and does not change the tasks or conclusions of the Recovery Strategy.
40	Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County Yreka	In general I support the recommendations for my District. I am of the opinion that the extremely detailed plan worked out for the Scott and Shasta, in particular, is an excellent blueprint for a voluntary, incentive-based strategy to move forward toward recovery in a deliberate	Comment noted.

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		manner based on sound science.	
41	Ms. Jene L. McCovey Native American Coalition for Headwaters Arcata	The coho salmon is an endangered species. The whole of the salmon world is managed at the brink of extinction. This means this "recovery" plan is late. The efforts need to be "AGGRESSIVE."	Comment noted.
42	Mr. Harry Vaughn Eel River Salmon Restoration Program Miranda	SB 271 was supposed to double the salmon population by 2000. Does the monitoring show that it did reach its goal?	The population monitoring of salmon species in general indicates that the goal of doubling the salmon population by 2000 was not attained.
43	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	The draft strategy as currently written doesn't present a clear path that leads us to: 1) the need to recover coho salmon, or 2) the actions that, if implemented, would lead to an improvement in the viability of the species.	The issue raised under #1 relates to the Status Review, not the recovery strategy. The Status Review of California Coho Salmon North of San Francisco, A Report to the Fish and Game Commission, April 2002, (hereafter referred to as 'Status Review') provides the best available data on coho salmon populations and the need to recover them. The Recovery Strategy states on the first page of the Executive Summary that "execution of this plan will ultimately lead to the recovery of coho salmon throughout its California range," and then lists over 750 actions that would lead to recovery.
44	Mr. Glen H. Spain Northwest Regional Director PCFFA and IFR	Agency staffing shortages is also a problem that needs to be addressed for the Plan to accomplish recovery. By introducing the words "as available" relating to agency staff to help implement its recommendations, the Plan is considerably weakened in its effectiveness. In all too many instances there may be no staff "available" at the right points in the recovery effort. Part of this Plan has to be a staff dedication and funding commitment from the State of California to make this Plan actually work on the ground.	The words "as available" have been removed from individual recommendations, as Section 9.1 (Availability of Funds) acknowledges limitations on funding and staff resources. Recovery of coho salmon is a high priority, and adequate state, local, and federal staffing and funding is recommended in the Recovery Strategy.
45	Ms. Pam Giacomini Director Natural Resources and Commodities	Rather than reinventing the wheel, California should replicate Oregon's process, which has led to a greater body of information (sound science) and a	California and Oregon are very different ecologically. As was discussed at the CRT meetings, the Department is currently in the process of adapting the

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	California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	straightforward implementation of recovery actions, which lead to recovery, all without listing the species or implementing any new regulations. The model is set for us, and it surely hasn't cost the state of Oregon $5.5 billion.	Oregon model for population monitoring to California.
46	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	Equitable apportionment of both public and private support and action; The department has completely excluded from this draft document all references to the numerous initiatives that have been developed and implemented on a voluntary basis. The Rangeland Water Quality Shortcourse, the Dairy Quality Assurance Program, The Code of Sustainable Wine Growing Practices, the Fish Friendly Farming Program, the MULTIPLE programs in Resource Conservation Districts in coho range along with ANY recognition of the hundred's of projects and millions of dollars that have been completed and spent by private landowners to improve the "plight" of coho. Even though the department has a comprehensive list that was developed over the course of the year and even though the Recovery Team heard from many, many landowners and their employees who have completed the recovery work. ALL of that information is absent from this document.	The Recovery Strategy was prepared in compliance with information requirements set forth in FGC § 2109. The CRT report to the Department (available online on the Department website) contains a list that was compiled by members of the team which recognizes the voluntary efforts referred to by the commenter. The Recovery Strategy has been amended to include a reference to this list.
47	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	I compliment you and your staff, as well as other members of the department for doing an incredible amount of work, juggling a lot of information and producing an extremely huge document. Our only hope is that the Coho Recovery Strategy be accurate, strategic, non-regulatory and implementable. It needs to be an efficient and effective means to learn about and provide actions to help coho. As the draft strategy is currently written, we don't believe that it is any of those things	Comment noted.

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48	Darin and Laura Claiborne Yreka	What environmental group threatened a lawsuit against California Fish and Game for not listing coho salmon?	The Department received a petition to list coho salmon as an endangered species north of San Francisco on July 28, 2000. The petition was filed by a citizen's group called the Salmon and Steelhead Recovery Coalition. There has been no threat of litigation from the petitioners or anyone else to date.
49	Ms. Chrissie Ishida Copco Lake	If efforts aren't being made in other areas of the state where the salmon are not just threatened but endangered then how do we fix that?	Individuals, watershed groups and agencies all over California have been and will continue to be involved in activities designed to protect and improve the viability of populations of coho salmon and other salmonids. With the listing of coho salmon comes the realization within the state that efforts must be stepped up in order to stop the trend of declining coho salmon stocks. Efforts similar to those being made in the Shasta-Scott are being made in the rest of the state. However, the efforts are more concentrated over a smaller, more homogeneous area in the Shasta-Scott to test the effectiveness of focused efforts at the scale of sub-watersheds, where it might be easier for agencies and local individuals and groups to work together to address local issues. As resources permit, other sub-watershed scale projects may be developed to focus efforts in other parts of the coho salmon range in California. A key element of resource recovery is a social willingness to affect the recovery. Rural communities, such as the Shasta-Scott watersheds, have an affinity for the aquatic resources within their communities since sustainable resource values are often inherent in their daily lives. The Department believes that recovery programs may be developed in other areas.
50	Ms. Chrissie Ishida	I wish to commend the DFG for allowing us the	Comment noted.

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	Copco Lake	opportunity to keep a little more local control through the SSRT; I think they are doing a great job. I know they are trying their best to come up with a realistic plan for the people who live up here.	
51	Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and Sonoma County Water Agency Walnut Creek	The Recovery Strategy should specifically identify the sources of data and information presented in the document. For example, it is unclear which data sources were used to develop values for recovery goals (number of coho by planning unit) and which data sources were used in the economic analysis to identify the number of actions needed to implement a specific recommendation (e.g. the number of dams, types fish passage facilities, stream crossings, etc.). Providing the sources of the information in the Recovery Strategy would improve the factual basis for the strategy and increase the reader's confidence that it is based on supportable data and used accepted scientific methodology.	The Department endeavored cite data and information sources throughout the Recovery Strategy. However, given the short statutory time-lines for completing the strategy, there are some instances where references to sources were not included, as the examples given by the commenter demonstrate. The Department welcomes the opportunity to work with the commenter and the recovery teams in the ensuing years to address this. Some information, such as enumerating all crossings, is not possible without solving issues of confidentiality, access, and field work (see recommendation XXX-C-02, page 9-16).
52	Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway	You have all put a great deal of effort into the Strategy development, and we want to help ensure that the time and expertise is not wasted, but indeed that the recommendations are implemented.	Comment noted.
53	Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway	I urge DFG to address the comments, made in public meetings, written comment and comments during CRT meetings, by CRT members, particularly those by NOAA Fisheries, Sierra Club, HSU, Yurok Tribe, Hoopa Tribe, FishNet 4C, Five Counties, The Nature Conservancy, Smith River Alliance, and CalTrout. The original recommendations submitted by the CRT to DFG should be available to the public, as well.	The CRT's report to the Director, which contains the original recommendations, is publicly available through the Department's website (with limited printed copies).
54	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	The Council strongly recommends that the Department in the finalization of the Draft Strategy and during its implementation take advantage of their expertise and	As indicated in the Recovery Strategy the Department wishes to work with the local knowledge base in each watershed to recover coho salmon

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		contact them for any technical assistance needed.	
55	Ms. Pamela Nicolai Marin Municipal Water District	It is not clear to whom this report is directed or who the audience is. For example, when a recommended strategy is to "encourage" a particular action, it is not clear who is to do the encouraging. The implementation chapter certainly identifies lead entities to implement a recommendation but it is not clear who would direct their efforts. We understand that recovery will take a collaborative effort of many agencies, organizations, and individuals, but the final report should be clear as to whom the report is directed. Otherwise, there is no assigned responsibility as to who is the driving force behind the recovery plan.	The Recovery Strategy is a guidance document and is non-regulatory. The Department attempted to provide clarification for words used in the recommendations, such as encourage and support. These clarifications are found in the implementation schedule. The responsibility to implement this document lies primarily with the Department, which intends to work closely with other agencies to ensure that the tasks are undertaken.
56	Mr. Ralph Modine Supervisor, 4th District Trinity County	We feel that additional fish and water objectives must contribute to the recovery of water quality and salmon habitat while not increasing social disruption or economic problems for its residents.	Comment noted.
57	Mr. Ralph Modine Supervisor, 4th District Trinity County	We believe that the intent of the recovery strategy recommendations are to address desired outcomes and change long-term trends of declining numbers of salmon and that it will be up to the local and state agencies to balance all of the factors. As such, the strategy recommendations serve as guideposts for local and other agencies as well as the public at large.	Comment noted.
58	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	It would be useful to include a list of the abbreviations used in this report. This list could be contained in a section, entitled "List of Abbreviations Used in this Document", located immediately following the "List of Appendices".	See Appendix A: Abbreviations and Acronyms.
EXECUTIVE SUMMARY			
59	Mr. Don L. Neubacher Superintendent	The Executive Summary should include information related to the prioritization and large scale actions that	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	National Park Service Point Reyes	are identified throughout the document. It should present the highest management priorities and recommendations essential to ensuring long-term protection and restoration of coho salmon.	
		1: INTRODUCTION	
60	Mr. Brock Dolman Occidental	The recovery strategy should involve multiple parties, all around the same table.	The development of the Recovery Strategy involved two recovery teams, totaling 31 members from the various interests and perspectives, including forestry, ranching, agriculture, commercial and recreational fishing, academia, environmental groups, and county, state, federal, and tribal governments. See Acknowledgments, Executive Summary (page ES-2), and Introduction (pages 1-3 to 1-5).
61	Mr. Wesley Anderson Humboldt-Del Norte Counties Cattlemen's Association Loleta	I would like it recognized that the land resource users were a minority on the committee. The environmental community would like to use this issue as an excuse to get the loggers out of the woods and the cows out of the watersheds.	Membership on the CRT consisted of 4 land resource user groups, 2 local agency (county) groups, 1 sport fishing group, 1 commercial fishing group, 1 water agency, 2 tribes, 2 environmental groups, 1 non-profit landowner group, 1 academician, 1 federal agency, and 4 state agencies. The only group that had equal representation with the land resource users was the state agencies.
62	Mr. Robert Brown Streamline Planning Consultants Eureka	Concerned that the CRT did not have a gravel mining representative. However, is pleased with the gravel recommendation in the plan.	Membership on the CRT was determined by the Director of the Department. The team needed to be of a manageable size in order to accomplish this task; therefore, not everyone could be included. The members were chosen to represent a broad range of constituents. Others were invited to coordinate with the CRT members and sit in on the meetings (and many people took advantage of these opportunities, including a representative from CMAC).
63	Ms. Catherine Kuhlman Executive Officer North Coast RWCB	Please define what is considered "…a significant portion of its range…" with respect to achieving the primary goal of coho salmon recovery.	There are two segments of this question; what is **significant** and what is a "**portion of its range**?"

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Santa Rosa		As discussed in Chapter 6, each ESU was segmented into recovery units. These recovery units are the scale to which each of the goals and criteria should be applied, and, where appropriate, the scale at which the targets should be measured. Each of these recovery units is, essentially, "a portion of its range." In order for an ESU to be down or delisted, recovery goals should be attained in each recovery unit within the ESU; thereby, indicating that all portions of its range within the ESU have recovered. Significance is not defined in CESA. However, it is a scientific judgment based on the entire record of the species at issue. There is no simple formula or rule regarding what is significant. Significance will vary case-by-case depending on a number of factors, including but not limited to the species, its distribution, the distribution of its habitat, the health of its populations, and the setting.
64	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	Please clarify the discussion in the last paragraph about "An additional goal of the Recovery Strategy is to restore coho salmon numbers to the point where tribal, recreational, and commercial fishing may occur." The fifth condition at the top of the page calls out commercial usage explicitly, so it is not clear why this aspect is identified as a part of a separate secondary goal. It is not clear whether CDFG is stating that these interests will be addressed in the conditions called out in FGC 2111 (a)-(e) or not. If so, the link should be made clear.	Recovery Goal VI was developed to specifically address FGC § 2111(e). Goals I through V address down- and delisting and their achievement establish the foundation for achieving Goal VI. See Chapter 4 for discussion.
65	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	**Page 1-8, Section 1.4.3.2:** The recovery strategy fails to discuss its relationship with the Conservation Implementation Program (CIP) which is being established by Reclamation and would be a Klamath River basin-wide program involving California. The CIP is intended to involve specific actions and activities	The Klamath River Conservation Implementation Program (CIP) is currently being revised and has not been released for agency review. The Department intends to evaluate the revised CIP when it becomes available to determine its potential contribution to recovery. The commenter is invited to work with the

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		which would contribute to recovery of coho salmon within the ESU. The CIP is referred to later in the document so it would be appropriate for the recovery strategy to mention it in this section. California should also prepare/coordinate the recovery strategy in light of the recent National Research Council's report titled *Endangered and Threatened Fishes in the Klamath River Basin: Causes of Decline and Strategies for Recovery*. That report also makes the strong recommendation that research and monitoring programs should be guided by a master plan. Reclamation believes that the CIP, if properly developed and implemented, could serve as the master plan. CDFG does recognize the existence of the CIP program as a potential funding source in Shasta/Scott river basin recovery strategies (see Chapter 10); therefore, there is clear rationale for acknowledging that the coho recovery strategy for the Klamath River Hydrological Unit should eventually become an integral part of the overall CIP process.	Department and recovery teams in the ensuing years to evaluate and integrate, if appropriate, aspects of the CIP into the coho s almon recovery strategy.
2: BIOLOGY - GENERAL			
66	Mr. William Davis Attorney Redding	In my experience the range of the species and the designation of habitat are also completely haphazard and speculative, at best.	Coho salmon range is established by looking at historic and current species occurrence documentation to determine historic and current range. The Department, other agencies, and the CRT used such information and protocols for addressing the range of coho salmon in California. Habitat designation and evaluation is determined using a habitat inventory methodology that is both field-tested and extensively utilized, both by the Department and many other agencies, organizations, and individuals who evaluate and restore anadromous salmonid habitat. See California Salmonid Stream Habitat Restoration Manual, 3rd edition (Flosi et al. 1998).

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
67	Mr. Denver Nelson Eureka	The Recovery Strategy does not contain historical or present day Coho fish numbers to use to verify the decline of Coho or to use as a baseline for measuring the success of completed or future recovery efforts. Coho are in trouble. Coho statistics should be included in this report.	Documenting the decline was part of the Status Review, not the recovery strategy. The Status Review of California Coho Salmon North of San Francisco, A Report to the Fish and Game Commission, April 2002, provides the best available data on coho salmon populations. See Chapter 4. The Department used the best available data for setting the baseline and respective targets for recovery, and where data were not adequate, put forth a method to get the data (or compete the analysis). To the extent new studies were provided, they must be evaluated in context of the entire body of literature as the recovery effort proceeds.
68	Ms. Linda Falasco Executive Director California Materials Association of CA Sacramento	Recovery Strategy does not contain as much scientific information as we expected about current populations, did not update the data in the Status Review, and fails to acknowledge data gaps.	These issues regard the Status Review and the process for updating the Status Review, not the Recovery Strategy. The Status Review provides the best available data on coho salmon populations. Updates to status reviews are done by the Department on 5-year intervals in accordance with FGC § 2077. In preparing the recovery strategy and key streams, the Department considered new data, which would not alter the conclusions of the Status Review nor the actions recommended in the Recovery Strategy. To the extent new studies were provided, they must be evaluated in context of the entire body of literature as the recovery effort proceeds.
69	Mr. Bernard F. Bush Director of Regulatory Affairs Simpson Resource Company Korbel	There is no recognition of places where coho salmon populations are increasing.	The Department acknowledges that a few streams with coho salmon population monitoring have shown years of increased juvenile numbers as compared to a previous year or two. However, monitoring has not been undertaken for a sufficient number of years, nor over a representative area of the ESUs to determine population trends in the face of high inter-annual variation.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
70	Mr. Mark S. Rentz Vice President Environmental and Legal Affairs California Forestry Association	We can't recover coho if we don't know what our starting point is or what our end point is, there isn't a shred of evidence in the draft strategy that the state of California knows what a viable population of coho salmon is or needs to be in order to sustain a viable coho fishery. This should be the highest priority and completed in the shortest time frame.	The Recovery Strategy specifically states throughout the need for more scientific information. The need for more complete and recent data is addressed in Monitoring of Coho Salmon (Section 5.4.2, pages 5-29 to 5-30), and in Range-wide Recommendations (Section 7.23, pages 7-16 to 7-17). While the Department did not provide an evaluation of viability in the Recovery Strategy (because the data were too limited), the Department intends to continue this task in Year 1, in conjunction with NOAA Fisheries, as stated on page 12-3.
71	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	Seven years after coho has been state-listed south of San Francisco Bay, and six years after coho was federally-listed north of the Bay, neither the department nor NOAA-Fisheries have in place a statistically valid sampling methodology for determining coho salmon presence-absence or abundance.	The Department has been implementing a scientifically valid method for determining coho salmon presence since 1999. In addition, in cooperation with NOAA Fisheries, the Department is in the process of adapting an Oregon Plan type model for population monitoring to the California Coastal areas.
72	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	The department has not used the best available scientific data. In fact, the first five chapters of this draft recovery strategy are simply a regurgitation of the Status Report issued by the Department in April 2002. Even in light of the fact that private landowners have offered numerous pieces of information, the department itself has done localized extensive monitoring along with other agencies (DWR, CDF, CGS). The department has refused to incorporate and update its science and data. Examples include: Dr. George Ice, CDF Hillslope Monitoring, Dr. Ken Tate, et al, in two studies, Simpson Timber, Pacific Lumber Co, Mendocino Redwood Co, Sierra Pacific Industries, etc, etc. The department has failed, yet again, to update their science, to consider the best available scientific data and information. Even though updated information is available; it is scientifically valid, most being done by	The Recovery Strategy was developed using the best available science, and was not intended to be an update of the Status Review prepared in 2002. New data are generated daily. The Department may or may not incorporate new "science and data" based upon its evaluation of the methods, analyses, and in light of the complete body of knowledge and as the recovery effort proceeds. For example, Ice et al. 2003 was put forth as science that should be adopted by the Department; however, this report has neither been published nor peer-reviewed and was only recently presented (November 2003—after the Public Review Draft of the Recovery Strategy was prepared) at a conference on TMDLs. The same issue holds for the reference to studies by Simpson Timber, Pacific Lumber Co., Sierra Pacific Industries, etc. The Department has incorporated data provided by Mendocino Redwood Co. in its Status Review.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		protocols approved by the department; and it has been offered to them. (See reports by Forest Landowner biologists, DWR presentation on fish counts, tables of counts completed by DFG).	In preparation of the recovery strategy and key streams, new data were taken into consideration; however, no attempt was made to rewrite the Status Review. Updates to status reviews are done by the Department on 5-year intervals in accordance with FGC § 2077.
73	Mr. Mark S. Rentz Vice President Environmental and Legal Affairs California Forestry Association	The draft Recovery Strategy fails to acknowledge that in California there is a lack of scientific data and research regarding the status of the coho salmon populations and habitat needs specific to California. In their 2002 request for funding from the Fishery Restoration Grants Program to develop a population sampling methodology on the behalf of the Department of Fish and Game ("Department"), Drs. Kenneth H. Pollock, David G. Hankin, Jim Nichols and Mr. Michael Mohr recognized that "recent listings of anadromous salmonids in California have been based on very limited information concerning status and trends. Data have been especially severe for the central and northern California coastal ESUs of coho salmon. For this species and ESU[s], it appears that the primary document relied on for the listing was a presence-absence compilation by Brown and Moyle (1991)." Brown and Moyle (1991) cautioned that "[h]historically estimates of state-wide coho abundance were simply guesses made by fisheries managers. Unfortunately, there is no way to test the reliability of these estimates and they should best be regarded as "ball-park" or "order of magnitude" estimates." We believe that it is critical to fully recognize the lack of scientific research and population data for coho salmon in California and highlight, from the beginning, the need	The Department and other agencies recognize the need for coho salmon population data. With regard to the 1991 information, since 2000, the Department has led the way in validating the information and determining the current distribution of coho salmon. The information included in 2002 Status Review and the November 2003 Recovery Strategy represents both an update to 1991 information and the preliminary analysis of current distribution. The Department used other historical, population information as order of magnitude estimates (see 2002 Status Review). The Recovery Strategy acknowledges the Department is partnering with NOAA Fisheries and others in the development of VSPs (see Chapter 4). And, the Recovery Strategy describes the process and activities to assess, monitor, and research coho salmon populations, habitat, and recovery (see pages 5-23 to 5-31; pages 9-16 to 9-17; many watershed-specific tasks). The Department looks forward to working with members of the CFA to gather information to better understand coho salmon populations and habitat to be able to focus the limited resources where they will be best utilized in coho salmon recovery.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		to improve our understanding of what constitutes a viable coho population and its habitat needs in California. By doing so, we will have a better understanding as to how we should focus our limited resources so recovery efforts are most effective and cost-efficient.	
74	Mr. Walter Epp Oakland	The 1940s are not the right baseline; significant damage had already been done by then. The baseline should be no later than the 1840s - before the gold rush wrought havoc on watersheds, including development, toxics, and sediment in coastal areas. The plan must not just do remediation after it's too late and the damage has been done but must also find the root causes and stop them.	Comment noted.
75	Mr. Walter Epp Oakland	Science is helpful and useful but we must recognize its limitations. Science often doesn't figure out what's going on until it's too late. "Scientific evidence" is only too often a euphemism for the damage has been done and it's too late to prevent it. Salmon can't wait for decades or centuries for science to get up to speed. To act only on what science has concluded is to presume that the present state of science is omniscient - in other words to act only on science is to live in a fantasy world. To act in the real world, we must not only rely on science but also the precautionary principle, recognizing the objective fact that science does not and never will have all the answers, so we must have an extra margin of safety to cover the many things science has not figured out yet. In other words, everything in the recovery plan must do substantially more than what science indicates is necessary, in order to have a margin of safety.	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		2.4: BIOLOGY – LIFE HISTORY	
76	Mr. Harry Vaughn Eel River Salmon Restoration Program Miranda	Takes exception to the wording that "coho generally move during day". They find a number of fish move at night.	The data available to the Department indicate that throughout its range, adult coho salmon generally move upstream between sunrise and sunset. These data do not preclude nocturnal movement by coho salmon and the variances found in any given stream. The Department welcomes new published, peer reviewed, or other data regarding nocturnal migratory movements of coho salmon.
		2.6: BIOLOGY – GENETICS	
77	Mr. Harry Vaughn Eel River Salmon Restoration Program Miranda	Glad to see genetic dendograms because they now know the tissue samples they have been collecting are being used.	Comment noted.
78	Mr. Al Gerhard Petaluma	Are hatchery and wild coho salmon considered separately?	Both hatchery and naturally produced coho salmon are included in the ESUs for CESA listing. However, Department and Commission policies direct that naturally produced salmon be the basis of salmon production in the state. The Department incorporated hatchery fish into this recovery strategy (Sections 3.4, 3.5, and Appendix I) in ways that we predict will aid natural recovery while avoiding some of the potential impacts associated with hatcheries.
79	Ms. Chrissie Ishida Copco Lake Mr. Darin Claiborne Yreka	There is no difference between "wild" fish and hatchery fish. Didn't the hatchery fish come from "wild" fish in the first place?	There is ample scientific evidence of the difference between hatchery-origin fish and natural-origin salmonids (see pages 89-98 of the Status Review, which provides over 75 scientific literature citations). In some cases, hatchery fish come from stocks that are not local, and so, may not have the full suite of genetic traits that make wild fish adapted to the environmental challenges of their natal streams.
80	Mr. Robert B. Davis Montague	How do you classify the Coho/Chinook hybrids? Stocks have been made from Washington, Puget Sound, and	Bartley et al. (1990) observed evidence of small numbers of first-generation coho/Chinook salmon

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		other of the SONCC-ESUs. Studies have shown modern science can differentiate between fish from different areas with some success, but even the latest DNA testing is not dependable. To further differentiate between Hatchery and Wild can not be done consistently.	hybrids in three fish from a tributary to the Trinity River, in 14 fish from rearing ponds on a tributary to the Klamath River, and in two fish from the ocean salmon fishery near Eureka. Samples from the rearing ponds were reported to be from inadvertent crossing of Chinook and coho salmon at Iron Gate Hatchery. These reports are the only evidence of hybridization between Chinook and coho salmon of which we are aware. The Department does not believe that hybridization among these species either in the wild or in hatcheries is a recurrent or persistent problem. The coho salmon stocks at Iron Gate and Trinity River Hatcheries are thought to be pure coho salmon stocks. There is ample scientific evidence of the difference between hatchery-origin fish and natural-origin salmonids (see pages 89-98 of the Status Review, which provides over 75 scientific literature citations).
2.7: BIOLOGY – HABITAT REQUIREMENTS			
81	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County Yreka	The figures for riparian cover and LWD presented in Table 2-3 (p. 2-31) are unrealistic targets for inland situations. The standards for riparian cover and large woody debris are completely unrealistic for inland streams. … Our streams are on the edge of the species' range where ambient temperatures can be extremely hot and climate considerably arid. … most of our streams do not naturally support the desired habitat described. It would not be appropriate to expect regional compliance with specifications based on coho need rather than natural potential.	Figures presented in Table 2-3 are based on general habitat requirements for life stages of coho salmon across its range in California and elsewhere. The Department of Fish and Game recognizes that considerable variation exists between coastal and interior habitats occupied by coho salmon. We do not intend the values for habitat elements in Table 2-3 to be used as restoration "targets" or "standards" for all streams that potentially support coho salmon. The following footnote was added to Table 2-3 in the final document: "Values presented in this table are based on general conditions found within suitable coho salmon habitat in California and elsewhere. Individual determinations of

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			habitat suitability and restoration potential should be based on site specific conditions in consultation with the Department of Fish and Game." As noted by the commenters, inland conditions are typically warmer and drier than those found in coastal areas. Consequently retention of vegetation, especially conifers, in inland riparian areas is very important for the maintenance of cool water temperatures and shade. In many instances, retention of existing riparian vegetation is relatively more important inland than it is on the coast.
82	Mr. Roy Thomas Carmel River Steelhead Association Monterey	The importance and architecture of large woody debris habitat enhancements needs to be developed more completely. All forms of cover need more emphasis as essential habitat.	The Status Review of California Coho Salmon North of San Francisco, A Report to the Fish and Game Commission, April 2002, provided more information on this topic.
83	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	The table of suitable ranges for coho lists dissolved oxygen in ounces/gallon. The literature summary preceding the table refers to dissolved oxygen in mg/L. Dissolved oxygen is most commonly expressed as mg/L and should be so expressed in this document.	The Recovery Strategy has been amended to address the comment.
		3: THREATS – GENERAL	
84	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	The Department was remiss in not citing various publications by Higgins.	Higgins et al. 1992 was cited in the Department's 2002 Status Review, and its information utilized in that review, which subsequently was a foundation for the recovery strategy.
85	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	This chapter is extremely misleading. It uses out dated science, even though updated science was provided to the department. It expresses a "sky is falling" attitude, when in actuality, we don't have the information to know if the sky is falling or not … a fact the department has admitted many, many times, but refuses to address in an open proactive manner.	The data and science cited herein are representative of the current body of knowledge. In response to your comments submitted to the Department prior to the release of the Public Review Draft, Chapter 3 was amended to reflect improvements in current agricultural and timber practices, and the discussion on urban impacts was expanded. Additional changes to the Chapter have been made as indicated in this

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			document.
		3.1.3: THREATS – OCEAN CONDITIONS	
86	Mr. Darin and Ms. Laura Claiborne Yreka Mr. Jeff Fowle Siskiyou County Farm Bureau Etna Mr. Peter Ribar Campbell Timberland Management Fort Bragg	There is little emphasis on impacts of non-land use issues. What is the effect of the marine environment and marine production?	Chapter 3 (Threats) does identify impacts of non-land use issues such as climatic variation and ocean conditions. See Section 3.1.3 (Ocean Conditions) for a discussion of the marine environment in the context of recovery planning. The Status Review of California Coho Salmon North of San Francisco, A Report to the Fish and Game Commission, April 2002, provided more information.
87	Mr. David Webb Mt. Shasta Gary, Karen, & Amanda Rainey Horse Creek Mr. Roy Thomas President Carmel River Steelhead Association Monterey	The complete avoidance of human induced changes in the oceans, especially the long term impacts of bottom trawlers on habitat for both coho and their prey species, and the potential/ongoing competition … between coho and commercial fishermen must be addressed, particularly since such a large percentage of the coho life is spent in the ocean, and since availability of food for the full range of coho sizes in the ocean seems to be one of the primary ocean condition factors driving coho numbers. It is wholly inadequate to present the ocean as “black box” with nothing beyond natural cycles beyond all human control at work. Given the fluctuations described in ocean conditions, analysis should be made of the feeding responses of coho under those varying conditions as a way to pinpoint possible human exacerbated bottlenecks, particularly in those years when ocean conditions would be described as “poor”. This could potentially lead to the development of measures to improve ocean survival particularly in poor years.	Impacts and factors associated with ocean conditions are discussed in the Status Review, Chapter VI, pages 80-81 and effects due to marine predators are discussed on pages 86-88. Effects due to commercial fishing are discussed on pages 133 – 136 of the Status Review. Implications on management and recovery were evaluated in Chapter VII, pages 181-182 of the Status Review, and conclusions are stated in Chapter VIII, page 185-188. There is not a great deal of information available regarding ocean ecology of coho salmon; however, the best available information was used to evaluate ocean related impacts in the Status Review. As more information on ocean ecology and commercial fishing effects becomes available, it will be used in future updates to the Recovery Strategy.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
88	Mr. David Webb Mt. Shasta	In discussing coho in the ocean, a description needs to be given to describing the range in the ocean that California-originating coho go, with a concurrent discussion of harvest throughout that actual ocean range, not just harvest south of the (artificial) boundary of California with Oregon	Although general ocean distribution of coho salmon across their range is relatively well known, region-specific differences have begun to be appreciated only recently (e.g., Weitkamp and Neely 2002. CJFAS 59:1100). Regional differences in distribution imply that different levels or kinds of ocean impacts might apply to different groups of fish which could be relevant to recovery planning. Variation in ocean distribution may also be a strong indicator of underlying genetic variation, which we want to preserve. However, this new information is more appropriate for a status review than for a recovery document. Still, the Department intends to assess and incorporate new information on ocean distribution into its recovery strategy as it becomes available. For example, we recently used ocean distribution patterns to inform decisions about coho salmon recovery hatchery outplanting in support of recovery. The Pacific Fishery Management Council promulgates ocean fishery regulations off the coasts of California, Oregon, and Washington. The actual harvest rates for California coho salmon are not known. However, PFMC has adopted management objectives to minimize the fishery impact on listed California coho salmon stocks. These include limiting the marine exploitation rate on Rogue/Klamath hatchery coho salmon to no more than 13% to protect SONCC coho salmon, and prohibition on all coho salmon retention off California to protect CCC coho salmon. PFMC documents can be accessed at www.pcouncil.org.
89	Mr. Bob Davis People for the USA	Mortality rates in the ocean are the biggest factor affecting coho. Need to increase hatchery production to compensate for ocean conditions.	Comment noted.
90	Mr. Walter Epp	Much too little is known about what's happening to	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Oakland	ocean ecosystems but they are under a lot of stress. Additional habitat must be provided to compensate for possible losses of Salmon due to problems during their ocean phase.	
		3.3: THREATS – PREDATION	
91	Mr. Darin Claiborne Yreka Mr. Jeff Fowle Siskiyou County Farm Bureau Etna Mr. Mike Strunk Sonoma County Farm Bureau Sebastopol Mr. Roy Thomas President Carmel River Steelhead Association Monterey	What about the effects of seals and sea lions? Marine mammal effects on recovery of coho need more attention.	Anadromous salmonids have historically coexisted with both marine and freshwater predators. Predation occurs on all life stages. Predation doesn't appear to have a major impact on a healthy population, but can be detrimental on those with low numbers or poor habitat conditions (Anderson 1995). Bokin et al. (1995), Hanson (1993), and Roeffe and Mate (1984) found that marine mammal predation on anadromous salmonid stocks in southern Oregon and northern California played a very minor role in their decline.
92	Mr. David Webb Mt. Shasta	On page 3-4, cormorants should be added to the inland predators likely to be feeding in part on coho. We see then periodically working in the Shasta River in the summer.	The Recovery Strategy has been amended to address the comment. Fresh (1997) includes double crested cormorants (*Phalacrocorax auritus)* in a list animals that prey on salmonids, [Fresh, K. L. 1997. The role of competition and predation in the decline of Pacific salmon and steelhead. In Pacific salmon and their ecosystems, D. Stroder, P. Bisson, R. Naiman, editors. Chapman and Hall, New York. 685 p.]
93	Mr. Ed Laurie Commissioner Plumas Co. Fish & Game Commission Beckwourth	I have major concern that if Northern Pike escape from Lake Davis the potential for them to spread throughout the state waterways is high. The Alaskan Department of Fish and Game has indicated that pike are salt water tolerant and can move from one stream to the next along the coast. Therefore salmon recovery strategies should	The Recovery Strategy range-wide implementation schedule includes tasks to address impacts of the northern pike and other invasive non-native species. See page 9-12, task numbers RW-XVIII-A-01, RW-XVIII-A-02, and RW-XVIII-A-03.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		include actions to deal with this potentially devastating non-native fish.	
94	Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and Sonoma County Water Agency Walnut Creek	Pikeminnow are identified as both native and introduced predators but it would reduce confusion if the Recovery Strategy identified where they are native (e.g. Russian River) and introduced (e.g. Eel River).	The Recovery Strategy has been amended to address the comment.
95	Gary, Karen, & Amanda Rainey Horse Creek	Take into consideration all forms of predator take of the Coho.	With the changes noted herein, the Department believes that all significant predators have been considered.
		3.4: THREATS – HATCHERIES	
96	Mr. Patrick Darner Yreka	Hatchery fish are causing problems and their numbers need to be reduced.	Comment noted.
97	Mr. Robert B. Davis Montague	The Coho in the Trinity River are primarily of hatchery origin. (CDFG 2001). With the hatchery fish in the Klamath, and other streams it is not reasonable to try to eliminate the hatchery fish in order to restore pure genetic Wild Coho. To accomplish this would require the destruction of the hatchery fish, leaving only the Wild. The result would be destruction of the major part of the Coho population with the remainder consisting of a mixture of Wild, and Hatchery fish that escaped marking or were hatched outside the hatchery. This would not make them Wild. To attempt a replacement of the numbers lost by predation and fishing harvest will require operation of hatcheries. The survival rate of natural spawn can not offset the modern demands on the stocks of fish.	Iron Gate and Trinity River hatcheries are mitigation facilities. Trinity River Hatchery successfully maintains an average annual return of 1,220 adult coho salmon and the upper Klamath River coho salmon run is diminished and primarily maintained by Iron Gate hatchery. However, Department and FGC policies focus on the improvement of natural production as the basis for recovery of imperiled salmon stocks. Attachment 3 of Appendix I (starting p. I-ATT-5) contains pertinent Department and FGC policies concerning the roles of natural and hatchery salmonid production. Appendices H and I of the Recovery Strategy contain recommendations and guidelines for use of hatcheries to recover coho salmon. These guidelines and recommendations will allow the Department to maintain mitigation obligations as much as possible while at the same time ensuring that conservation and recovery goals can be met.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
98	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	Hatcheries can be an important component in providing a stable level of coho production. The Department in the past raised significant numbers of coho and over the past several years has almost completely shut down operation of coho hatcheries. (See charts on hatchery production submitted in CFBF August 2002 comments). The department's attitude now is that hatchery production may be harmful to coho salmon survival. Even though they admit they have no scientific basis for this attitude. "Hatcheries may have contributed to declines of coho salmon in California, although to what degree is unknown. Currently their potential to do harm is limited by decreased hatchery production and modern management policy."	There is ample scientific evidence for potentially negative effects of hatcheries and hatchery-origin fish on both natural- and hatchery-origin salmonids (see pages 89-98 of the Status Review, which provides over 75 scientific literature citations). The Department has considered how hatchery operations might be modified or specifically designed to facilitate recovery of listed salmonids. The recovery hatchery policies and guidelines in Appendices H and I of the Recovery Strategy provide guidance on the appropriate and scientifically defensible use of hatcheries for recovery of coho salmon.
99	Mr. David Webb Mt. Shasta	The fact that hatchery mitigation goals were set long ago and didn't include options for flexibility or the imposition of the ESA shouldn't be accepted as fixed in stone and unchangeable. Those goals should be re-examined for appropriateness, and cost neutral changes considered that will promote delisting. Without delisting, one could reasonably question just what mitigation the hatcheries are providing with the fish they grow, and if they aren't mitigating, then the project that they are the mitigation for may need to be brought into question. I don't think anyone really wants them to just go through the motions of growing fish for no purpose.	Integration of hatchery mitigation and ESA goals is indeed challenging. With the help of the CRT, the Department developed the hatchery guidelines in Appendices H and I of the Recovery Strategy to address just such concerns. These guidelines and recommendations will allow the Department to maintain mitigation obligations as much as possible while ensuring that conservation and recovery goals can be met. The Department will be re-examining mitigation goals as part of the HGMP process for each anadromous fish hatchery.
3.6.1: THREATS – LAND USE – FOREST ACTIVITIES			
100	Mr. Bernard F. Bush Director of Regulatory Affairs Simpson Resource Company Korbel	The draft Recovery Strategy fails to adequately consider the changes to the California Forest Practice Rules specifically designed to address forestry operations as it might affect coho habitat. There are only two sentences in the forestry section (3.6.1 Forestry Activities) that	Forestry activities and the known and potential effects on coho salmon are addressed in Section 3.6.1 (pages 3-10 to 3-11, and 3-12). Legacy effects are emphasized and recognition is given to changes in forestry practices. "Current forestry activities,

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA) Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka Mr. Mark S. Rentz Vice President Environmental and Legal Affairs California Forestry Association Mr. Peter Ribar Campbell Timberland Management Fort Bragg	recognize changes in forestry practices over the past 150 years. Neither sentence expressly recognizes changes in the FPRs. Needs to include: - the changes in the FPRs specifically designed to address coho salmon. - the changes put in place by the BOF to address the state listing of coho salmon south of the San Francisco Bay in 1995 and continue with the changes to the FPRs in response to the federal listings of coho salmon in 1996 and 1997. - the document provided to the CRT by Mr. Lucke that explains in detail the changes adopted by the BOF. Section 3.6.1 should discuss the finding s of the BOF's Monitoring Study Group's Hillslope Monitoring Project. It is critical for the Commission to have a full understanding of the changes to FPRs and how effective these changes have been, especially given that the petitioners are continue to demanding additional regulations of forestry operations.	including forest nonpoint source control programs, have made strides in improving pollution and sediment discharge into streams over historical forestry practices" (pg. 3-11). Forest Practice Rules (FPRs) adopted, in part, specifically for the benefit of anadromous fishes, including coho salmon (e.g., FPR 916.9, 936.9, 956.9. Protection and Restoration in Watersheds with Threatened or Impaired Values) have only been in effect since 2000. Though people involved in forestry generally agree that these new rules have benefited watersheds, there has not been sufficient time to determine if there have been benefits to coho salmon. This point was made by members of the CRT, including the representatives of forestry and CDF. The Recovery Strategy considers the changes to the FPRs; the Recovery Strategy (Section 5.5) has been amended to include a table regarding recent changes in the FPRs. The Monitoring Study Group's Hillslope Monitoring Project specifically found more major and minor departures from the FPRs at roads and crossings. It should be acknowledged that the Hillslope Monitoring Project does not measure the effectiveness of the rules on coho salmon populations, and does not measure long-term effectiveness of the rules. FPRs adopted, in part, specifically for the benefit of anadromous fishes, including coho salmon (e.g., FPR 916.9, 936.9, 956.9. Protection and Restoration in Watersheds with Threatened or Impaired Values) have only been in effect since 2000. People involved in forestry generally agree that although these new

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			rules reduce some of the site-specific impacts which resulted from timber operations conducted under prior regulatory requirements, there has not been sufficient time to determine if there have been benefits to coho salmon. Under the Threatened and Impaired Watershed Rules there may be short term adverse impacts to coho salmon habitat, but there is considerable existing information to infer that the retention of more riparian overstory canopy, including large conifers, and the reduction of sediment inputs into watercourses, will lead to long term improvements in habitat condition. However, there has not been sufficient time to measure coho population response. Finally, the new rules do not address all aspects of timber harvesting which affect habitat for coho salmon (e.g., Class II and Class III watercourses).
101	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	There is no regard, acknowledgment or recognition of the voluntary activities and improvements made in forest practices over historical or legacy practices. A rewrite of portions of the subchapter are as follows: "Current forestry activities including forest nonpoint source control programs have made remarkable strides in reducing pollution and sediment discharge into streams. Recent assessments suggest that the use of current forest practices and Best Management Practices, have led to water quality impacts from current management activities to be about 10% or less of those of historic activities (Ice, Megahan, McBroom, Williams 2003). As described in the discussion of legacy effects, there are on-going impacts to coho salmon habitat from historic timber operations. The Department's conclusion is that historical forestry practices impacted watersheds inhabited by northern California coho salmon, and that current activities (e.g.,	The Recovery Strategy was prepared in compliance with information requirements set forth in FGC § 2109, and acknowledges the importance of a cooperative, voluntary approach with private landowners. The CRT report to the Department (available online on the Department website) contains such a list that was compiled by members of the team which recognizes voluntary efforts. The Recovery Strategy has been amended to include a reference to this list. Ice et al. 2003 was put forth as science that should be adopted by the Department; however, this report has not been published nor peer-reviewed and was only recently presented (November 2003) at a conference on TMDLs. The Department must consider new information in light of the complete body of scientific literature as the recovery effort proceeds (see pages 101-112 of the Status Review). One study citing a 90% reduction in

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		road construction, use, and maintenance; activity near streams and on unstable slopes; removal of sources of future LWD) may still have some effect habitat elements essential to every life-stage of coho salmon that inhabit coastal streams and rivers. More work is needed to assess those impacts and identify future best management practices."	sediment using current forestry practices does not negate the multitude of scientific literature that cites much less gains or even, in some circumstances, no gains.
102	Ms. Danielle Lindler Executive Director Klamath Alliance for Resources and Environment	Section 3.6.1 states that impacts to freshwater habitat are increases in sedimentation, loss of large woody debris, increased stream organic matter, and decreased stream bank stability. According to the current FPRs and the T&I Rules that have been implemented in T&I watersheds, there is no way these effects are currently a result of forestry activities. It is disappointing that the Department still views current forestry activities as having an impact on freshwater habitat. There is no mention of the beneficial impacts forest management has on watersheds, such as private habitat restoration projects, improvement in crossing design and removal of roads from riparian zones.	Section 3.6.1 addresses historic, contemporary, and potential impacts. The Department acknowledges the advances that current rules made, especially regarding Threatened and Impaired Watershed Rules. With regard to the Threatened and Impaired Watershed Rules, they were adopted, in part, specifically for the benefit of anadromous fishes, including coho salmon (e.g., FPR 916.9, 936.9, 956.9. Protection and Restoration in Watersheds with Threatened or Impaired Values) and have only been in effect since 2000. People involved in forestry generally agree that although these new rules reduce some of the site-specific impacts which resulted from timber operations conducted under prior regulatory requirements, there has not been sufficient time to determine if there have been benefits to coho salmon. Under the Threatened and Impaired Watershed Rules there may be short term adverse impacts to coho salmon habitat., but there is considerable existing information to infer that the retention of more riparian overstory canopy, including large conifers, and the reduction of sediment inputs into watercourses, will lead to long term improvements in habitat condition. However, there has not been sufficient time to measure coho population response. Finally, the new rules do not address all aspects of timber harvesting which affect habitat for coho salmon (e.g., Class II and Class III watercourses).

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
103	Ms. Sally French Land owner, FLC Board Member Buckeye Conservancy Vettersburg	Have foresters been given enough time with their new mitigation efforts to see an effect?	FPRs adopted, in part, specifically for the benefit of anadromous fishes, including coho salmon (e.g., FPR 916.9, 936.9, 956.9. Protection and Restoration in Watersheds with Threatened or Impaired Values) have only been in effect since 2000. Though people involved in forestry generally agree that these new rules have benefited watersheds, there has not been sufficient time to determine if there have been benefits to coho salmon. This point was made by members of the CRT, including the representatives of forestry and CDF.
104	Mr. William E. Snyder Deputy Director Resource Management California Department of Forestry Sacramento	From the outset, CDF has taken the position that the forest practice rules pertaining to watercourse and lake protection are effective in preventing negative impacts to coho salmon. CDF's conclusions are based largely on recent findings by the Hillslope Monitoring Group (task force appointed by the Board of Forestry and Fire Protection (BOF) and the Modified Completion Report-Post Harvest Monitoring work conducted by CDF inspectors. The BOF adopted interim rules for the past three years enhancing protection for coho salmon (Protection for Threatened and Impaired Watersheds). Due to the short timeframe that has elapsed since adoption of the interim rules, an insufficient amount of sampling data has been collected to draw any meaningful conclusions. However, CDF is confident that implementation of existing rules continues to be effective in protecting water quality for coho salmon.	FPRs adopted, in part, specifically for the benefit of anadromous fishes, including coho salmon (e.g., FPR 916.9, 936.9, 956.9. Protection and Restoration in Watersheds with Threatened or Impaired Values) have only been in effect since 2000. Though people involved in forestry generally agree that these new rules have benefited watersheds, there has not been sufficient time to determine if there have been benefits to coho salmon. This point was made by members of the CRT, including the representatives of forestry and CDF.
105	Mr. Al Gerhard Petaluma	Does the recovery strategy address the issue of the threats of fire with regard to siltation where forestry does not occur?	The threat of large, severe fires is addressed across the range of coho salmon. See range-wide recommendations RW-XXX-D-01, RW-XXX-D-03, RW-XXX-D-04, RW-XXX-D-05, RW-XXX-D-06, and RW-XXX-D-07 (page 9-18). Threat of fire is also addressed under watersheds

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			deemed to be at risk. See watershed specific recommendations: KR-OR-05 (page 8-9); KR-UK-06 (page 8-10); KR-HC-06 (page 8-12); KR-SV-06 (page 8-14); KR-BC-01 and KR-BC-02 (page 8-15); SA-HA-05 and SA-HA-06 (page 8-19); SS-HA-01 (page 8-20); and TR-HY-02 (page 8-24).
106	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	Needs Ligon et al. 2000. More on cumulative effects from timber [harvest].	Ligon et al. 1999 was cited in the Department's 2002 Status Review, and its information utilized in that review, which subsequently was a foundation for the recovery strategy. Also see pg. 3-10 and Table 3-3, page 3-12.
107	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	Roads. See Cederholm et al. Densities too high and paying too much for timber company improvements.	Cederholm et al. 1981 and 1997 were cited in the Department's 2002 Status Review, and its information utilized in that review, which subsequently was a foundation for the recovery strategy. Cederholm et al. 1981 addressed cumulative effect of sediment from logging roads.
108	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	Needs Dunn et al. 2001. How much disturbance has to occur in a watershed before it cannot recover? Need GIS to identify refugia- where the trees are.	Comment noted. Dunn et al. is "A Scientific Basis for the Prediction of Cumulative Watershed Effects."
109	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	Reeves et al. 1992 has this answer. In Oregon, timber harvest of only 30% of watershed will show an effect on fish.	The amount of harvest and its effects on fish differs depending on geology and soils, other land practices and condition, where trees are harvested within a watershed, rain patterns, and the fish species of concern. The commenter is invited to share the specifics on his view of the application of the findings of Reeves (1992) evaluation and how and where it applies to coho salmon in either ESU.
110	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	Table 3.3 (p.3-12) presents inaccurate and misleading information regarding the effects of forest management activities on the stream environment and salmonid habitat. The source for this table (Hicks et al. 1991) is also not cited in the references section. Recommend	Hicks et al. 1991 has been added to Chapter 13. A table has been added to the Section 5.5 regarding recent changes in the FPRs.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		that Table 3.3 be deleted from the recovery strategy.	
111	Mr. Mark S. Rentz Vice President Environmental and Legal Affairs California Forestry Association	It's critical that section 3.6.1 discusses the findings of the BOF's Monitoring Study Group's Hillslope Monitoring Project.	The Monitoring Study Group's Hillslope Monitoring Project specifically found more major and minor departures from the FPRs at roads and crossings. It should be acknowledged that the Hillslope Monitoring Project does not measure the effectiveness of the rules on coho salmon populations, and does not measure long-term effectiveness of the rules.
112	Mr. Walter Epp Oakland	Salmon's requirement for big logs aka large woody debris means logging must be reduced - if all the trees are committed to logging there won't be any LWD.	The Recovery Strategy discusses the significance of LWD (see pages 2-24 to 2-31). Recovery tasks were developed range-wide (see pages 9-10 to 9-11) and within watersheds (e.g.,
113	Mr. Doug Smith Humboldt Watershed Council Arcata	There needs to be specific recommendations for timber activities. The Department is allowing 65% harvesting in this watershed, and there are too many roads. These are not legacy effects.	Comment noted.
114	Mr. Walter Epp Oakland	Logging or road-building that causes excess sedimentation, and especially soil erosion which reduces the ability of trees to grow back, must be reduced or stopped. For example, in the case of Pacific Lumber, a rigorous Independent Science Panel's Final Report on Sediment Impairment and Effects submitted to the North Coast RWQCB in January 2003 found that with current practices logging must be reduced by a factor of ten in some areas to meet water quality standards.	To the extent that all of the timber management alternatives are based on the current FPRs, which include the Threatened and Impaired Watershed Rules, they address to varying degrees measures to reduce erosion and sediment delivery to watercourses. Roads and sediment are also addressed in Chapter 7, Section 7.5. The referenced report was followed with a Phase II report and the Department closely reviewed both documents. Based upon these reviews the Department believes these two reports contain too many significant flaws to be useful as tools in planning for coho salmon recovery.
115	Mr. Brian Woolsey Hydrologist/Geomorphologist Samoa	The influences that forest practices have on streamflow are not addressed. This section should at minimum address potential changes to the hydrograph including,	The Department's 2002 Status Review addresses potential forestry effects on coho salmon, and Section 3.6.1 of the Recovery Strategy provides an overview.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		changes in minimum and peak flow magnitudes, flow timing, flood frequencies. The effects of timber harvest on streamflow have been well studied (e.g. Lewis 1997, Keppeler and Ziemer 1990, Ziemer et al 1998, Wright et al 1990, and others). Additionally, the impacts of forest practices on rain-on-snow events are not addressed (see Harr 1986, Berris and Harr 1987, and Heeswijk et al 1995).	Additionally, stream flow, as it applies to coho salmon, is addressed throughout the Recovery Strategy. Tasks to address stream flow range-wide are found on pages 9-4 and 9-5, and there are many applicable tasks in the watershed-specific implementation table (table 9-2). With regard to what the commenter thinks is applicable for rain-to-snow phenomena and coho salmon recovery, the commenter may work with the Department and recovery teams in the ensuing years after the Strategy is adopted by the Commission to evaluate apply the appropriate information and documents.
116	Ms. Danielle Lindler Executive Director Klamath Alliance for Resources and Environment	It is stated that forestry practices increase maximum and average summer water temperatures and decrease winter water temperature. There is conflicting science surrounding these statements. As evaluated by the HSU Foundation Forest Science Project (Regional assessment of Stream Temperatures across northern California and their Relationship to Various Landscape-level and site-specific Attributes, Lewis et al. 2000), local ambient air temperatures greatly influence temperature; stream reaches farther from the watershed divide have warmer temperature; historical data indicate that temperature changes over time in the same stream; northern CA data from the 1950s and 1960s show that streams regularly exceeded 20 degrees C; canopy closure across forests averaged 70-83%.	The Department believes the assessment provides an extremely useful compilation and initial analysis of data and information. The Department concurs that the relationships of the many climatic, geographic, temporal, and ecological are complex and affect both regional and local differences in water temperature regimes over time and space. However, the report does not address these relationships with coho salmon, coho salmon habitat, different forestry practices (whether recent, contemporary, or historical), and does not discuss forestry practices with regard the effects on water temperature related to different temporal, spatial, or physical differences in Northern California.
3.6.2: THREATS – LAND USE – WATER DIVERSIONS AND FISH SCREENS			
117	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	"A substantial amount of coho salmon habitat has been lost or degraded as a result of water diversions and groundwater extraction." There is not one reference to support that statement.	The cited sentences were taken from the Status Review, and the references to support these statements are included in the Status Review (please see pages 112-118).

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
118	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	"In some streams the cumulative effect of multiple small legal diversions may be severe. Illegal diversions are also believed to be a problem in some streams within the range of coho." There was a significant focus from the recovery team and the department on enforcement of existing laws as well as identifying illegal water diversions, of which we all learned, is a significant number. Now the department is downplaying the impact of illegal diversions and places a huge amount of blame on the "cumulative effect of legal diversions". We highly question how we got to this point and on what basis the department is basing this claim.	There was no intention to downplay illegal diversions, and many actions set forth in the Recovery Strategy target illegal diversions and enforcement (e.g., , RW-I-D-06, RW-II-A-02, and RW-XXXIII-A-05) as well as addressing cumulative impacts of legal diversions (RW-II-A-01, and RW-II-A-05).
119	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	A rewrite for last paragraph on page 3-11 is as follows: "In some watersheds, the demand for water has already exceeded the available supply and some water rights have been allocated though court adjudication. These adjudications usually did not consider coho salmon habitat needs at a level that could be considered protective under CESA; however they generally do account for consistent in-stream flows as well as by-pass flows. The use of wells adjacent to streams is also a significant and growing issue in some parts of the coho salmon range. Extraction of flow from such wells may directly affect the adjacent stream, and much more work is needed to determine a direct connection between surface flow and groundwater."	The last paragraph on 3-11 was rewritten as follows: "In some watersheds, the demand for water has already exceeded the available supply and some water rights have been allocated though court adjudication. These adjudications usually ~~have~~ did not consider coho salmon habitat needs at a level that could be considered protective under CESA. The use of wells adjacent to streams is also a significant and growing issue in some parts of the coho salmon range. Extraction of flow from such wells ~~often directly affects the~~ may directly affect the adjacent stream, but is often not subject to the same level of regulatory control as diversion of surface flow. Site specific groundwater studies are required to determine a direct connection between surface flow and groundwater, and these are often very costly and take a significant amount of time to complete."
120	Mr. Walter Epp Oakland	When the price of water diversions rises to cover the cost of restoration, there will be an incentive to conserve, use drip irrigation, switch to less water-hungry crops, or switch to a different land use.	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
121	Mr. Walter Epp Oakland	All water projects and dams that impact Salmon habitat must be on the table for decommissioning, modification of the structure, modification of the management, etc.	The Department and CRT considered all water barriers during development of the Recovery Strategy. Fish Passage tasks (page 9-7) and Klamath River HU tasks (page 9-33) represent recovery tasks developed to address this issue.
122	Mr. Walter Epp Oakland	The public must maintain control over rules for dams, flow regimes, and fish passage requirements. Privatization and deregulation must not be allowed to threaten Salmon recovery.	Comment noted.
123	Mr. Roy Thomas Carmel River Steelhead Association Monterey	We believe the Constitution of the State of California specifically states that all the water that flows in the State of California belongs to the people of California and that the people are to put that water to the highest and best use. It also states in Section 2, Article 10 that the water needs to be put to reasonable use. The people own the State's water; water use is granted by the people. The people should not have to buy back their own water when they have a higher or better or more reasonable use for it. Water rights can be given and taken back. The State also has a public trust responsibility (83 Audubon vs. Supreme Court). It has to mange the water use so that resources like coho salmon do not need a recovery plan. When it turns out that a recovery plan is needed, the Constitution and the laws on the books need to be vigorously enforced.	The Recovery Strategy calls for enforcement and improved implementation of existing laws. See Sections 7.2 and 7.20. In California, there is a complex system regulating the right to use surface water. The Recovery Strategy includes recommendations that recognize and enforce the public trust. See for example, RW-II-A-01 (page 7-3), RW-XXXIII-A-03 (page 7-13), and RW-IIA-04 (page 7-3).
3.6.3: THREATS – LAND USE – INSTREAM FLOWS			
124	Mr. Denver Nelson Eureka	The most obvious and most easily corrected cause of salmon decline in the last century is not given enough emphasis in this Coho Recovery Strategy. The damming and diversion of the major California rivers has resulted in loss of habitat, fish lethal flows below the dams and water polluted by irrigation runoff.	The Recovery Strategy includes tasks that address passage for fish above and around dams (e.g., page 9-7, KR-HU-04), feasibility studies on dam removal (e.g., KR-HU-11), and maintaining appropriate flows (e.g., KR-HU-08). Most of these tasks are included in the respective watershed section (either HU or HSA).
125	Mr. Patrick Higgins	There are huge problems with de-watering of streams.	Unauthorized diversions are addressed in SW-II-A-02

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Consulting Fisheries Biologist Arcata	Half of the ponds on the Navarro River are without a permit.	(Section 7.2 – Water rights) and in RW-XXXIII-A-04, RW-XXXIII-A-05, and RW-XXXIII-A-27 (Section 7.20 – Enforcement of existing laws).
126	Mr. Brian Woolsey Hydrologist/Geomorphologist Samoa	This section mainly focuses on depleted flows from water diversions; however, neglects increased peak flows, flow timing, and alterations in flood frequencies, which are common hydrologic responses of land use practices such as urbanization, timber harvest, and agriculture.	A sentence has been added to this section to acknowledge these other hydrologic responses to land alteration.
		3.6.4: THREATS – LAND USE – ARTIFICIAL BARRIERS	
127	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	Table 3-4: Loch Lomond/Newell Creek Dam on the San Lorenzo River blocks off 6 miles of habitat, or approximately 10% of the habitat in the San Lorenzo River.	The Recovery Strategy has been amended to address the comment.
128	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	The meaning of the percent of basin column is not clear. First, does the percent refer to the entire basin, or just to the portion considered to be or have been coho habitat? If the former, the figures for Klamath basin above Iron Gate appear to be incorrect, since the area in Oregon is comprises about 36% of the basin.	It is the former (see paragraph 2, page 3-15). The Commenter can work with the Department and recovery teams in the ensuing years during implementation to re-evaluate the calculation regarding Iron Gate Dam.
		3.6.5: THREATS – LAND USE –GRAVEL EXTRACTION	
129	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	Gravel mining. Needs more control; flattens streams out and makes deserts.	See RW XXXV-A-01, page 9-26.
130	Ms. Linda Falasco Executive Director California Materials Association of CA Sacramento	Section 3.6.5 addresses gravel mining impacts but not the benefits that removal of excess sediments can have.	The Implementation Schedule includes tasks that call for the removal of excess sediment, but does not describe the method (though mining is one potential method).
		3.6.8: THREATS – LAND USE -WATER QUALITY	
131	Mr. Denver Nelson	Recovery Strategy should better reference or highlight	The Recovery Strategy recognizes the significance of

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Eureka Mr. Larry Moss Smith River Alliance Trinidad Mr. Patrick Darner Yreka	water quality and quantity.	water quality and quantity and has incorporated numerous range-wide and watershed specific recommendations, as developed by the CRT and SSRT, to address these issues.
132	Mr. Al Gerhard Petaluma	What does impaired mean with regard to siltation and coho salmon habitat?	Under Section 303(d) of the 1972 Clean Water Act, states, territories, and authorized tribes are required to develop lists of impaired waters. Impaired water bodies are those not meeting set water quality standards. Impaired with regard to siltation implies siltation has exceeded the water quality standard or Total Maximum Daily Load (TMDL).
133	Mr. Brian Woolsey Hydrologist/Geomorphologist Samoa	This section does not mention suspended sediments and turbidity, which are known to be primary impairments to many coho water bodies in California that are listed under section 303(2) of the Clean Water Act.	This section of the Recovery Strategy presents an overview of water quality threats as detailed in the Status Review of California Coho Salmon North of San Francisco Bay. Suspended sediments and turbidity as impairments are implied with the various discharges specified in Section 3.6.8 (Water Quality) and with reference to the Clean Water Act § 303 and TMDL plans. More importantly, suspended sediments and turbidity are addressed by Range-wide recommendations for Pollution, Sedimentation (page 7-4), and Timber Management (page 7-13) and by numerous Watershed Recommendations (Chapter 8).
134	Mr. Al Gerhard Petaluma	Are nutrient levels normal?	The Department and recovery teams recognized that there is insufficient understanding of the ecological relationship of nutrient levels and coho salmon. This issue is a priority for research. See range-wide recommendation RW-XXIX-B-03 (page 7-16) and

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			watershed specific recommendations MC-GA-07 (page 8-43) and MC-NA-03 (page 8-44).
135	Mr. Sterling McWhorter Petrolia	Geologists cannot agree on the causes of sediment input. Some say its land use while others say it's unavoidable because of the geology of the watershed.	Comment noted.
136	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata Mr. Felice Pace Klamath Forest Alliance Klamath Glen	Need to better address road density as an issue. No acknowledgment that increased road density can result in increased [sediment] discharge in forested lands. See May et al. 1996.	The Department and recovery teams discussed this phenomenon during development of the Recovery Strategy. Road density is only one possible measure of understanding effects to watercourses and, per se, may not be an accurate measure. The key is determining which road segments and crossings are contributing sediment and need repair, and placement of roads in relationship to actual and potential effects to watercourses. The Department supports the concept of road management planning and prioritization of road maintenance and repair. Road use, placement in the watershed, the quality of roads, and their maintenance were considered to be of paramount importance rather than just density. The Recovery Strategy contains numerous recommendations related to sediment issues (see pages 9-8 and 9-9; page 9-18 for TMDL recommendations). Also, various watersheds have specific recommendations. Some of these recommendations address the evaluation and feasibility of road closure.
137	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	Silvicultural discharges should be included in the list that precedes Table 3-16. Table 3-6, p. 3-19. The CWA Section 303(d) list of impaired waters includes the following listings in addition to those included in Table 3-6. Table 3-6 should be modified to reflect all of the listings in the North Coast	The Recovery Strategy has been amended to address the comment.

<table>
<tr><th>NUMBER</th><th>PERSON/ORGANIZATION</th><th>COMMENT</th><th>RESPONSE</th></tr>
<tr><td></td><td></td><td>region:

<table><tr><td>Russian River</td><td>Sediment, temperature</td></tr><tr><td>Laguna de Santa Rosa</td><td>Sediment, temperature, nutrients</td></tr><tr><td>Gualala River</td><td>Temperature</td></tr><tr><td>Navarro River</td><td>Sediment, temperature</td></tr><tr><td>Big River</td><td>Temperature</td></tr><tr><td>Ten Mile River</td><td>Sediment, temperature</td></tr><tr><td>Noyo River</td><td>Sediment</td></tr><tr><td>Mattole</td><td>Sediment, temperature</td></tr><tr><td>Eel River (entire basin, not just delta)</td><td>Sediment, temperature</td></tr><tr><td>Van Duzen River</td><td>Sediment</td></tr><tr><td>Redwood Creek</td><td>Sediment, temperature</td></tr><tr><td>Mad River</td><td>Temperature</td></tr><tr><td>Trinity River</td><td>Sediment</td></tr><tr><td>South Fork Trinity River</td><td>Sediment, temperature</td></tr><tr><td>Salmon River</td><td>Nutrients, temperature</td></tr><tr><td>Scott River</td><td>Sediment, temperature</td></tr><tr><td>Shasta River</td><td>Temperature, low dissolved oxygen</td></tr></table></td><td></td></tr>
<tr><td colspan="4">3.6.9: THREATS – LAND USE – AGRICULTURAL IMPACTS</td></tr>
<tr><td>138</td><td>Ms. Pam Giacomini
Director
Natural Resources and Commodities
California Farm Bureau Federation
Sacramento
(also on behalf of CFA, CFLA, CCA)</td><td>Pg 3-20 3.6.9 Agricultural Impacts
This entire paragraph is unwarranted and not current. The science referenced is old, outdated and not based in California. In addition the Recovery Team made numerous recommendations to assist agricultural and forestry landowners in an attempt to keep these operations healthy and in place, because they realized that these working landscapes are able to sustain a viable coho fishery as opposed to an urban setting. Our proposed rewrite is as follows:</td><td>The Recovery Strategy acknowledges that it is important to maintain working landscapes. Page 5-10 states “Approximately 36% of all lands in coho salmon range are private agricultural and forested lands. Cooperative efforts to maintain and restore coho salmon habitat on private land are usually more effective in watersheds where there are large contiguous parcels of forest and agricultural lands, in comparison to watersheds with multiple small ownerships and a relatively high human population density. This is only one of the benefits of having</td></tr>
</table>

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		"Historical agricultural practices through non-point source pollution have affected aquatic and riparian areas. Recent studies and surveys have shown that sediment delivery to streams in the form of non-point source pollution is caused mainly by roads (Lewis, Tate, Harper, and Price 2001). The conversion of uplands from forest or grasslands to agriculture increases erosion and ground water use (CDFG 2001c). In February 2000, Sonoma County adopted a vineyard ordinance to control sedimentation caused by vineyard erosion (Merenlender et al. 2000). The ordinance identified three levels of vineyards and seven types of highly erosive soils, imposing corresponding requirements (CDFG 2001c). To address potential environmental impacts of agricultural operations, several programs have been developed. These programs assist landowners in developing best management practices for their respective crops and land use. Some of the programs developed include: Code of Sustainable Winegrowing Practices, the Rangeland Water Quality Shortcourse and the Dairy Quality Assurance Program. Improper grazing can affect riparian characteristics and associated aquatic systems, such as vegetative cover, soil stability, bank and channel structure, instream structure, and water quality and quantity. Trampling may compact soils, decreasing water infiltration and increasing runoff. However, light trampling can break up surface soils that have become impervious, and allow for greater water absorption; but this also makes the soil more susceptible to erosion (Spence et al. 1996). Recent studies indicate that proper livestock grazing does not significantly increase nutrient and sediment levels in streams (Dahlgren, Atwill, Tate, Lewis, Harper, and Allen-Diaz 2001)."	productive resource and community-based landowners maintaining lands in a contiguous and open landscape." Cited references vary from 1976 to 2001, and are representative of the body of knowledge on this subject. The new reference suggested ((Lewis, Tate, Harper, Price 2001) is supported by other data from other activities as well, and has been reviewed and added to the Recovery Strategy. "Lewis et al. 2001 found that sediment delivery to streams is mainly caused by roads." The following change has been made to the first paragraph of Section 3.6.9: "Historical and some current agricultural practices …." The following suggestion has been added to Section 3.6.9: "To address potential environmental impacts of agricultural operations, several programs have been developed. These programs assist landowners in developing best management practices for their respective crops and land use. Some of the programs developed include: Code of Sustainable Winegrowing Practices, the Rangeland Water Quality Shortcourse and the Dairy Quality Assurance Program." The suggested new reference (Dahlgren, Atwill, Tate, Lewis, Harper, Allen-Diaz 2001), does not adequately represent the body of scientific literature on this issue. In a more recent reference, including one of the same authors (George, M, N. McDougald, K. Tate, and R. Larson, 2002. Sediment Dynamics and Sources in a Grazed Hardwood Rangeland Watershed. USDA Forest Service Gen. Tech. Rep. PSW-GTR-184) it was found that cattle trails in California produced a

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			forty times more sediment than adjacent vegetated soil surfaces.
139	Ms. Noelle Cremers Director, Industry Affairs California Cattlemen's Association	CCA is concerned with the portrayal of agriculture in the threats section of the Recovery Strategy. Using national data on erosion from 1989 does not portray an accurate picture of the current threats. On a national basis erosion from agriculture has decreased significantly since 1989. In fact, the National Resources Inventory (NRI), a report outlining the condition of the Nation's non-federal lands, found that erosion on both cropland and Conservation Reserve Program lands dropped from a total of 3.07 billion tons per year in 1982 to a total of 1.9 billion tons per year in 19971. However, even this decline does not portray an accurate picture of the threats to coho. The most recent NRI (1997) found that cultivated cropland contributes 0.7 tons/acre/year while pastureland contributes only 0.1 tons/acre/year and the contribution from rangeland is not even calculated because it is minimal. The non-federal land uses in current and historical coho habitat are mainly pastureland and rangeland (724,200 acres) rather than cropland (36,800 acres). CCA would recommend that the Department utilize the information available in the NRI before making blanket statements about agriculture's effects upon coho habitat.	The Department used the best information available and also solicited information from recovery team members and their organizations. If the CCA believes there is more useful information regarding erosion, the Department can evaluate the information with the recovery teams in the ensuing years to update the Recovery Strategy.
140	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	The list of possible grazing impacts should also include increased nutrient inputs from deposition or release of animal waste in watercourses.	The Recovery Strategy has been amended to address the comment.
3.6.10: THREATS – LAND USE - URBANIZATION			
141	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	There is not enough about urban threats, e.g., impervious surfaces, etc.	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Mr. Brian Woolsey Hydrologist/Geomorphologist Samoa	This section should include more detail on urbanization effects on flows, specifically flow timing and flood frequency alterations. For example, Hammer (1972) and Hollis (1975) found that peak flows with recurrence intervals of 2-years increased by factors of 2, 3, and 5 with 10, 15, and 30 percent impervious development, respectively. Additionally, there is no discussion of urbanization effects on aquatic insects. May et al. (1996) found that aquatic insects were significantly reduced as fine sediment exceeded 15% in urbanized areas where the total impervious area exceeded 20%.	
142	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	The definitive statement in this section is that unlike other development (Agriculture/Forestry) damages to coho environment created by urban development are not likely to ever recover. But after such a definitive statement no regulation response or other actions are proposed. The document should propose limits to further development along streams, wetlands, riparian corridors and floodplains. The document should also address the effects of existing development on coho streams, including for example effects on flood flows, flood plains, and riparian areas. The Department should challenge local governments to mitigate existing impacts and avoid future impacts to coho streams.	Comment noted.
		3.6.11: THREATS – LAND USE – FISHING	
143	Mr. David Webb Mt. Shasta	In discussing harvest on page 3-25, the statement is made that 'most of the non-retention coho that are released survive'. While that may (or may not) be true in the case of recreational anglers, it seems to be unlikely in the case of commercial troll fishermen. Data needs to be provided to support this contention. If no data exists, then it either needs to be presented as an assumption, or struck.	Upon review, we agree that this statement is not supportable. The statement has been removed from the Recovery Strategy. See The Status Review of California Coho Salmon North of San Francisco, A Report to the Fish and Game Commission, April 2002, Section VI, Factors affecting the ability to survive and reproduce, Fishing and illegal harvest, p. 133, for a complete review.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
144	Mr. David Webb Mt. Shasta	Hatchery issues inexorably lead to harvest issues, since providing fish for harvest is still the primary role of hatcheries, so, while it is admirable (or should the word be appropriate?) that the Yurok Tribe has harvest related data, and that the Yurok harvest was relatively small in the ceremonial and subsistence categories (page 3-25), no annual numbers were provided, and the commercial harvest category was completely skipped even in qualitative terms. Presenting a 10 year average impact of 4.4% begs the question of whether or not in some years the impact has been significant. The fact that no data exists for tribal harvest other than Yurok ceremonial and subsistence seems indefensible since (supposedly) managed harvest is apparently occurring.	The Yurok Tribe is under no obligation to provide those numbers to the Department, and they have not done so. For this reason, we have not included these evaluations in either the status review or the recovery strategy. See The Status Review of California Coho Salmon North of San Francisco, A Report to the Fish and Game Commission, April 2002, Section VI, Factors affecting the ability to survive and reproduce, Fishing and illegal harvest, p. 133, for a complete review.
145	Mr. David Webb Mt. Shasta	The details of harvest of all kinds were "glossed over" in the document makes it look as if awkward details are being hidden. If data on this important topic is available it should be presented. Where no adequate data exists, plans should be proposed to gather it for future evaluation.	We used all of the pertinent harvest data that we are aware of in The Status Review of California Coho Salmon North of San Francisco, A Report to the Fish and Game Commission, April 2002, Section VI, Factors affecting the ability to survive and reproduce, Fishing and illegal harvest, p. 133. This document provides the best available data on this issue. Because of fishery closures and the relative rarity of coho salmon, we have very little in the way of details on incidental harvest. The PMFC has adopted management objectives to minimize the fishery impact on listed California coho salmon stocks. These include limiting the marine exploitation rate on Rogue/Klamath hatchery coho salmon to no more than 13% to protect SONCC coho salmon, and prohibition on all coho salmon retention off California to protect CCC coho salmon. PFMC documents can be accessed at www.pcouncil.org. Plans to reestablish a coho salmon ocean fishery and to monitor ocean fishery impacts to coho salmon

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			pursuant to recovery can be found in the Recovery Strategy in Sections 3.6.11, 3.6.12 on page 3-25, and in Sections 4.3.1 and 4.3.2 on pages 4-10 and 4-12.
146	Mr. Sterling McWhorter Petrolia	What is the relationship of ocean harvest?	Ocean harvest of coho salmon is addressed in Sections 3.6.11 3.6.12 (page 3-25). In addition, the issues regarding ocean harvest after delisting are addressed in Sections 4.3 (page 4-10), 4.3.1 and 4.3.2 (page 4-12).
147	Mr. William Davis Attorney Redding	Ocean fishery is permitted to take hundreds of thousands of salmonids for commercial and sport purposes, and an unknown number of coho are permitted to be taken. Freshwater sport fishery is permitted to continue take coho and other salmonids at rates hundreds if not thousands of times greater than any take that aggregate extraction is permitted.	Commercial fishery retention of coho salmon has been prohibited since 1993, recreational ocean retention since 1994, recreational freshwater retention south of Horse Mountain since 1995, and all coho salmon retention since 1998. The Pacific Fishery Management Council manages the mixed ocean salmon fishery to minimize impacts to listed species, including coho salmon. Available data suggest that take of coho salmon in the ocean fishery is not impacting coho salmon stocks. We know of no scientific information that supports the statements in this comment. If information that supports these statements becomes available, the Department will consider it in future Recovery Strategy updates.
148	Mr. Roy Thomas, President Carmel River Steelhead Association Monterey Mr. Darin and Ms. Laura Claiborne Yreka	The role of the high seas drift net fisheries, both legal and illegal, concerning the destruction of the California coho population should be investigated and understood. According to Kate Meyers of the University of Washington School of Fisheries and a US Rep to international North Pacific Fisheries Commission, coho and steelhead have been caught in much higher numbers in the drift net fisheries than would be expected from their ocean abundance.	Comment noted.
		4: RECOVERY GOALS AND DELISTING CRITERIA	
149	Ms. Marcia H. Armstrong	There is not enough data on current or potential	The Department used the best available information

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	District 5 Supervisor Siskiyou County Yreka Mr. Denver Nelson Eureka Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka Mr. Mike Strunk Sonoma County Farm Bureau Sebastopol Yreka	numbers of coho salmon populations. We don't know how many fish exist or how many should exist.	while developing the Recovery Strategy. The commenter raises issues related to the status review, not the recovery strategy. The Status Review of California Coho Salmon North of San Francisco, A Report to the Fish and Game Commission, April 2002, provides the best available data on coho salmon populations. The need for more complete and recent data is addressed in the Recovery Strategy under Assessment (Section 5.4.2; page 5-26) and implementation of range-wide recommendations for "Assessment, Monitoring, and Research" (Section 9.5; page 9-16 and 9-17).
150	Mr. Bernard F. Bush Director of Regulatory Affairs Simpson Resource Company Korbel	How can we embark on a recovery when we don't know how many coho salmon we have now nor how many we need to have for a viable population?	While the Department did not provide an evaluation of viability in the Recovery Strategy because the data were too limited, the task will be continued in Year 1, in conjunction with NOAA Fisheries, as stated on page 12-3.
151	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	The Department has not identified interim population targets for down/delisting. The Department claims that it will require "21 to 24 years" to define "Recovery Goals I and II". The Department should set some interim target goals in lieu of this inability to develop any such goals in less than "two or more decades".	For Goals I and II, interim targets were set for most down-listing criteria. Preliminary delisting targets for Goals I and II for the SONCC ESU are in table 4.2. Preliminary down-listing goals for the CCC ESU are in table 4.3. Since down-listing is the initial target, delisting goals have not been set for the CCC ESU yet. The Department is working to develop interim targets for the other criteria. The 21-24 year timeframe is discussed in reference to re-establishing fisheries and not Goals I and II.
152	Mr. Darin and Ms. Laura Claiborne Yreka	What is a level of sustained viability? More specifically, what is the actual number of escapement for the whole variety of rivers in the plan? This is an unrealistic goal	Recovery and delisting criteria for both coho salmon ESUs are presented in Chapter 4 of the Recovery Strategy. Escapement targets needed to achieve

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		without a number to shoot for.	downlisting from endangered to threatened status are specified for recovery units in the Central California Coast ESU and range from 1,350 spawning adults for the San Mateo Coast to15,000 spawners for the Russian River and Mendocino Coast recovery units. Escapement targets have not yet been developed for recovery units in the Southern Oregon Northern California Coast ESU. The Department and NOAA Fisheries intend to investigate the need and feasibility of applying the spawner abundance criterion to the SONCC as additional data become available.
153	Mr. Matt Goldsworthy Aquatic Biologist Mendocino Redwood Company Fort Bragg	It is widely accepted by fisheries professionals that methods used to estimate adult spawning populations of salmonids result in population estimates that are highly variable. It is unfortunate that statistically unsound data (historic adult spawning population estimates) are being used to define recovery objectives. The methods used to estimate adult populations in the past were archaic and are no longer or seldom used by fisheries professionals for these reasons.	Methodologies used in the past were seen to be state-of-the-art and appropriate at the time. Old methodologies were not applied to recent data. The Department, in collaboration with the recovery teams, used the best available data to develop the metrics for measuring recovery goals and criteria. The goals themselves were not a result of quantitative data referred to by the commenter but rather all data as well as conservation and ecology principles. Because the Recovery Strategy process is both ongoing and based on adaptive management, as better data become available, the Department may revise methods used for measuring population characteristics. See comments above for response to development of program and protocols for measuring coho salmon status and trend.
154	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	Public Review Draft does not own up to what is required for recovery as stated by Brown et al.	The Recovery Strategy addresses the management points outlined in Brown et al 1994. If further citation details are provided, the Department would welcome additional information for consideration in the ensuing years of implementation.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
155	Mr. Denver Nelson Eureka	The goals are too diffuse.	Comment noted.
156	Mr. William Davis Attorney Redding Ms. Linda Falasco Executive Director California Materials Association of CA Sacramento Ms. Jene L. McCovey Native American Coalition for Headwaters Arcata	Fails to define recovery in any meaningful manner. In 6.21(b), we recommend removal of the word "recovery" until that word is better defined. It is difficult to understand what the State believes will constitute coho salmon recovery.	Recovery is defined on page B-9. The Department and recovery teams believe achieving the goals and criteria described in Chapter 4 will lead to recovery of both ESUs of coho salmon in California.
157	Mr. David Webb Mt. Shasta	On page 4-6, the document suggests the development of a "Habitat Quality Index". The concept seems to be just fine, but based on past experience I have little hope that it will accurately and fairly assess the Shasta River given its differences from other typical coho streams. This section recommending the development of an HQI needs to include recommendations/assurances that it will be first reviewed, and if appropriate then modified to match the geology, morphology, climate and other relevant conditions for the stream to be assessed.	Comment noted.
158	Mr. David Webb Mt. Shasta	I found Table 4-1, *Targets for De-listing* to be largely incomprehensible. It needs to be more clearly integrated to the preceding text section (4.2.2.1), and its footnotes need to be overhauled so that they clearly and understandably describe the table as it is. Obviously much of the essential information can be gleaned from the notes, but only with an inordinate amount of effort. Fixing it will probably mean a paragraph contained within the box enclosing the table explaining why there is no entry/column for goals II, IV, and V, instead of footnotes	This section and the table have been re-written to improve clarity.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		to columns that don't exist, which only adds to the confusion.	
159	Mr. David Webb Mt. Shasta	The note for goal 1 is confusing in that it never mentions criterion 1 or 2, although it appears that it likely refers to them. Exactly how the numbers = goals is unclear to me. I can make guesses, but shouldn't have to guess on so important a topic.	This section and the table have been re-written to improve clarity.
160	Mr. David Webb Mt. Shasta	The note explaining the absence of Goal 1 Criterion 3i, 3ii, and 3iii only raises additional questions—just how many criteria are there if somewhere they go up to 3iii? I did not see a discussion of all the goals and criteria what seemed to be all encompassing. The text portion dealing with goals needs to explain both those criteria that are present, and those that will be added, and how they will be evaluated.	This section and the table have been re-written to improve clarity.
161	Mr. David Webb Mt. Shasta	The note that is supposed to be explaining goal 3 doesn't help to predict what will happen with streams with no historic data one way or the other. Is it suggesting that delisting will occur when 75% of the streams with historic data have presence, even if all other streams have no coho what so ever? If that's the case, then the streams with historic data need to be identified, as do those that do not. That seems like an unlikely explanation since while presence can be documented with some certainty (if someone had the time to go out and look), absolute absence cannot ever be documented except in a stream that can be demonstrated to be absolutely uninhabitable. The goal and/or the explanation needs further thought.	This section and the table have been re-written to improve clarity.
162	Mr. David Webb Mt. Shasta	The footnotes for goal 3 criterion 1 and 2 call for maintaining the current range and distribution, respectively—what is the difference?	This section and the table have been re-written to improve clarity. Simply stated, range is the geographic extent of the species; distribution is the allocation/dispersion of the species to the streams within the range.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
163	Mr. Wesley Anderson Humboldt-Del Norte Counties Cattlemen's Association Loleta	The document mentioned or made reference to about everything that has occurred in California in the past 100 years as contributing to the Coho problem, but it did not identify what actions could actually achieve recovery.	The tasks required for recovery are listed in the implementation matrices, Chapters 9 and 10.
164	Mr. Tom Hofweber Supervising Planner County of Humboldt Eureka	Encourage development of spawner population target goals for the SONCC basins, would be finer targets and be more publicly recognizable measures of success.	The Department will consider and evaluate establishing and applying spawner pair targets to the SONCC, in conjunction with the recovery teams in the ensuing years of implementation. See Chapter 4.
165	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	DFG does not acknowledge Fish and Game Code section 2084 under Fisheries Restoration Goal (4.3) and Recreational Fishing (4.3.1) except for a footnote and should acknowledge in the Strategy that fishing may be allowed under this code section especially on a site-specific basis. Without the ability to define "*Recovery Goals I and II*" for "21 to 24 years" it appears that DFG has inadvertently denied the possibility of resuming recreational fishing under Fish and Game Code section 2084 if appropriate in a shorter timeframe. Contrary to DFG's statements, restoring recreational fisheries on a site-specific basis can be accomplished prior to the five goals and Fish and Game Code section 2084 legally allows it. DFG must clarify this in their Strategy. The Department has not addressed the immediate opportunity to fish for marked hatchery coho by differentiating between wild and hatchery stocks and developing a recommendation for recreational fishing for hatchery-marked fish. The CRT discussed this for the Trinity River, and it should be included and addressed in the Strategy.	The footnote specifically acknowledges that fishing may be allowed under Section 2084 of the FGC. This may be done on a site-specific basis notwithstanding the recovery goals. Although the opportunity to fish for marked hatchery coho salmon was discussed by the CRT, no recommendation regarding 'immediate' fishing was developed or adopted. The Recovery Strategy provides for investigating/pursuing such a fishing opportunity. The relationship between hatchery and wild fish on the Klamath-Trinity River Basin is complex and not completely understood. Additionally, there would need to be a clearer understanding of incidental mortality, the mortality of wild fish while fishing for hatchery fish. This effort will require extensive field staff and time to evaluate.
166	Mr. Matt Goldsworthy Aquatic Biologist Mendocino Redwood Company Fort Bragg	Delisting/Downlisting Criteria for Mendocino Coast HU: The goals or criteria stated to delist or downlist the species are vague and lack sufficient detail. More detail is needed to achieve the results expected from this plan.	The Department believes there is sufficient detail in the recovery goals, criteria, recommendations, and implementation tables to guide and achieve recovery.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		Goal I: Criterion 1 9 streams in this HU were chosen to "*maintain and improve*" populations of coho salmon. These streams are supposedly listed in Appendix D. However, Appendix D is missing from the plan. The 9 streams selected could play a major role (i.e., if a stream was selected that never supported coho salmon). If there are coho salmon present in these 9 streams in 2003, then these streams could arguably have already '*maintained*' the species. There is no time frame mentioned in the plan. There is no definition of what '*maintaining*' a population means. At what point is it appropriate to conclude a population has been '*maintained or improved*'? There is no mention of what population metric should be measured (whether juvenile abundance, adult abundance, or consistent brood year presence) to detect an '*improved*' population. If a particular population estimate reveals that there were more coho salmon in 2002 than in 2001 does that imply the population has improved? In the least, a time frame is needed because the maintenance of a species is an ongoing process.	The nine streams preliminarily identified to have coho salmon maintained or improved were listed on page D-8. Those streams are: Cottaneva, Pudding, Caspar, North Big, and Elk creeks and Albion, North Fork Navarro, South Fork Garcia, and North Fork Gualala rivers. The fish in these streams are the target for maintenance or improvement. The Department, in coordination with NOAA Fisheries, academic institutions and several other parties, is designing the monitoring protocols and metrics for measuring coho salmon status and trend. See pages 5-23 to 5-31. Tentatively, the Department plans on using adult abundance in Goal I, criterion 2 and brood-year presence in Goal I, criterion 3. See Chapter 4. Maintain was defined in the August public version of the Recovery Strategy and was inadvertently omitted in the November version: Maintain: To not allow further decline (i.e., number and size of populations, amount and quality of habitat). The Department is in the process of determining the specific time-frame for population monitoring. This framework is being done for all coastal, salmonid species. The Department knows it will be reporting results annually to the Commission and every 5 years in the Status Review updates (see Chapter 12) and that any initial analysis or model of coho salmon will take 2 or more decades (see page 4-11).
167	Mr. Matt Goldsworthy Aquatic Biologist Mendocino Redwood Company Fort Bragg	Downlisting Criterion for Mendocino Coast HU Goal II: Criterion 1: 15,000 spawning adults must be present to downlist the Mendocino Coast HU. Is the objective of 15,000 spawning adults measured throughout the HU, or 15,000 adults measured from the 9 select streams mentioned in	The target of 15,000 spawning adults is for the entire Mendocino HU. When the 15,000 spawning adult target is met, it would signify that the Mendocino HU had reached the target level contribution to the CCC ESU for Goal II,

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		Goal I: Criterion 1? There is no time frame stated for this objective. If 15,000 adults are estimated to be spawning in this HU in 2004, would this be considered to have achieved Goal II: Criterion 1 and thus result in downlisting the species?	criterion 1. When the down-listing goals for the CCC ESU are met, down-listing could occur. Delisting/downlisting cannot occur only within a watershed
168	Mr. Matt Goldsworthy Aquatic Biologist Mendocino Redwood Company Fort Bragg	Downlisting Criteria for Mendocino Coast HU Goal III, criterion 3: The criterion states that to downlist coho salmon, the species must be present within 60% of the streams where it historically occurred. The Department has acknowledged the fact that data on the historic distribution of coho salmon is problematic and not based upon real data; rather it is based upon personal communications, personal judgment, and anecdotal evidence. It seems inappropriate to base the goals for the recovery of this species upon data which is known and widely accepted to be flawed. This objective may be very difficult to achieve due to the fact that many streams considered to have historically support coho salmon did not actually support the species.	The Department has spent the last three years validating the historic distribution data referred to in this comment; the Department is still improving on the base information. Goal III, criterion 3 is not based on the original data but on validated data and information. Streams that did not historically have coho salmon have been removed from the data and do not have a role in the achievement of increased distribution. The Department will report on any improved distribution data to the Commission.
169	Mr. Matt Goldsworthy Aquatic Biologist Mendocino Redwood Company Fort Bragg	Downlisting Criteria for Mendocino Coast HU Goal V, criterion 1: The objective states that coho salmon can be downlisted if 633 miles of streams are enhanced or restored. This objective may have already been achieved. There is no mention of time frame for this objective, nor the criteria needed to determine when a mile of stream has been '*enhanced*' or '*restored*'. Does this imply 633 miles of habitat must be restored or enhanced after 2003? Stream miles already enhanced or restored should count towards this objective due to the impossibility of restoring the same stream twice. How many miles of habitat can be enhanced through each habitat enhancement project? If treating one source point of erosion could arguably 'enhance' several miles of stream	The Department intends to calculate the amount of habitat already enhanced or restored in the Mendocino Coast HU by reviewing all past restoration activities. The Mendocino Redwood Company is welcome to assist the Department directly in this effort or to work with the Department and the recovery teams. Enhancement projects can target variable amounts of habitat. The Department intends to work with the recovery teams, local watershed groups, and all those involved in restoration activities to determine how much habitat is targeted for enhancement and how much is enhanced. The Department will use its Fisheries Restoration Grant Program to facilitate much

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		habitat, how will the amount of stream miles 'enhanced' or 'restored' be calculated? How many instream structures are required to 'enhance' one mile of stream?	of this effort. And, there will be effectiveness monitoring to determine how much habitat was effectively restored or enhanced (see pages 5-27 to 5-30 and page 7-16).
170	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	The commercial and sport fishing recovery could be improved with hatchery stock. How is this accounted for in the 21 year estimate for restoration of commercial, sport and tribal fishing?	The Recovery Strategy first evaluates hatcheries as to their role in recovery of coho salmon (see 2002 Status Review; pages 2-15 to 2-25, 3-6 to 3-9, and appendices H and I). The 21-24 year timeline (page 4-11) discussed with reference to Goal VI is only the initial evaluation of conditions and may be too short at period to evaluate fisheries restoration.
171	Mr. Richard Ridenhour McKinleyville	The objectives for the sizes of the escapements needed to achieve recovery have been stated. Information beyond presence or absence is generally wanting for various subpopulations. The lack of this information would raise the question about the ability to accurately measure the sizes of future populations in order to determine whether or not they have recovered.	Chapter 4 discusses the process by which the Department and its partners plan to gain additional population information. Proposed, range-wide tasks can be found on pages 9-16 and 9-17.
172	Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and Sonoma County Water Agency Walnut Creek	The Recovery Strategy states that recovery will be achieved by maximizing genetic diversity. Given the importance of this, it seems that the Recovery Strategy should identify maintenance or enhancement of genetic diversity as one of the main Recovery Goals identified in section 4.2.1. The five goals included pertain to demographics and habitat. A sixth goal that specifically relates to maintaining and enhancing genetic diversity could be added to highlight the importance of genetic diversity.	The Department concurs. Comprehensive investigation into the genetic diversity of coho salmon must first be done before either a meaningful genetics recovery goal can be articulated or an appropriate metric(s) could be proposed to evaluate achievement of the goal. The Recovery Strategy prioritizes the genetic investigation necessary to pursue this issue (see RW XXIX-B-03, page 9-16).
173	Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and Sonoma County Water Agency Walnut Creek	It is unclear how the Department developed the quantitative targets identified for downlisting. As no explanation or justification is provided, it is difficult to understand what the targets are based on. We would like to understand the rationale behind why 15,000 spawning coho in 60 percent of the historic habitat with	See pages 5-23 to 5-31 and Chapter 12 for explanations on how aspects of the Recovery Strategy will be revised as more information is gained and as implementation unfolds. The quantitative targets were not set to be directly related to viability analysis as, stated in Chapter 4, VSP analysis is to be completed

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		50 miles of restored streams would warrant delisting in the Russian River. We wonder how these targets relate to population viability analysis for coho salmon. The quantitative targets on page 4-9 seem at odds with statements on page 2-17, in section 2.5.2, where the Recovery Strategy states "For California coho salmon, evaluation of viability is based on assessments of abundance, population growth rate, structure, and diversity, for which reliable estimates are not available. Therefore, it is not possible to determine viability targets, in terms of numbers of fish, for coho salmon at this time." The rationale behind the quantitative targets should be explained and how they would we adjusted or modified when the genetic data is available.	at future data by the federal TRTs. At that time, the Department and recovery teams may evaluate VSPs with regard to the Recovery Strategy. The fish number and river mile targets were set by two processes, one involving Department evaluation and one by utilization of a preliminary model. The percent increase in distribution was set by Department evaluation of needed distribution to afford each ESU protection from stochastic events or localized impacts. The narrative of this process has been expanded in the Recovery Strategy.
5.1: ELEMENTS NECESSARY FOR RECOVERY – ROLE OF PUBLIC LANDS			
174	Mr. Don L. Neubacher Superintendent National Park Service Point Reyes	Golden Gate National Recreation Area manages watersheds within the coastal Marin HU supporting coho salmon. It should be included in the list of NPS units present in section 5.1.1.3.	The Recovery Strategy has been amended to address the comment.
5.2: ELEMENTS NECESSARY FOR RECOVERY – FUNDING FOR PRIVATE AND PUBLIC COOPERATION			
175	Mr. Don L. Neubacher Superintendent National Park Service Point Reyes Ms. Noelle Cremers Director, Industry Affairs California Cattlemen's Association Ms. Pam Giacomini Director, Natural Resources and Commodities, California Farm Bureau Federation Sacramento	Funding available to CA from Farm Bill is misleading. The plan states that the Farm Bill is a potential source of funding to support coho salmon recovery. It fails to document how much of the $17 billion is actually allocated to NRCS Areas within the recovery plan area. A table documenting this would show how little is actually available through these programs. For example, the amount available through the NRCS Marin-Sonoma Office is $1 million, while the Humboldt County office has only $600,000 per year to distribute through the program. Stating that the rules allow for projects up to $450,000 per operation is misleading, given the Farm Bill allocations per county. Identifying such gaps through this plan could provide a stronger basis for local area	We have updated the Section 5.2.1.7 to better represent the funds available to California from the Farm Bill.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	(also on behalf of CFA, CFLA, CCA)	offices to pursue additional Farm Bill funding.	
176	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	The Draft Recovery Strategy lacks any detailed discussion as the habitat restoration efforts and funding (state and federal) associated with the State salmonid habitat restoration program. From 1981-2001, the State has expended almost $100 million for California coastal salmon and steelhead restoration projects. $60.66 million was for projects involving direct improvements for fish habitat (fish migration improvement projects (e.g. barrier removals) - $17.52 million, 350 projects; instream fish habitat improvement projects - $19.37 million, 443 projects; sediment reduction projects - $17.74 million, 321 projects; and riparian restoration projects - $603 million, 152 projects). This $100 million does not include costs incurred by landowners to voluntarily improve salmon habitat or costs to landowners associated with regulatory mandates specifically designed to protect and enhance salmon habitat (e.g. increased riparian buffer zone widths under the Forest Practice Rules, increased canopy retention standards under the FPRs, large tree retention requirements for future LWD recruitment under the FPRs).	Section 5.2.1.1 of the Recovery Strategy discusses the Department's Fisheries Restoration Grant Program, which funds projects throughout coastal California for all salmonid species. The figures cited correctly depict the expenditures of the Department's Fisheries Restoration Grant Program as stated in a 2003 Department publication (which is available upon request).
177	Gary, Karen, & Amanda Rainey Horse Creek	Look at providing alternative funding for affected parties.	Various sources of funding are available for implementation.
178	Mr. Ralph Modine Supervisor, 4th District Trinity County	Unfortunately, the plan incentives are largely linked to economic support through state and federal grant programs and conservation easement purchases. These are valuable tools, but are dependent on stable state and federal funding, which we think is precarious. If state/federal funding is reduced or eliminated, how will these recommendations be carried forward?	The Department believes that Fisheries Restoration Grant Program funds will remain at or near the current level. If funds were to significantly decrease in all federal and state programs, the department would still rely on cooperative, voluntary approaches to implement the Strategy.
5.2.3: ELEMENTS NECESSARY FOR RECOVERY - PRIVATE AND PUBLIC COOPERATION - VOLUNTARY INCENTIVES			
179	Mr. Peter Ribar	The recovery strategy needs to emphasize incentives	The Recovery Strategy is primarily voluntary and

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Campbell Timberland Management Fort Bragg Mr. Darrel Sweet President California Cattlemen's Association Livermore	and conservation.	incentive based. Incentives for landowners include but are not limited to land and resource stewardship, financial assistance through grant programs (Section 5.2), and ultimately delisting of the species.
180	Mr. Bernard F. Bush Director of Regulatory Affairs Simpson Resource Company Korbel Ms. Sally French Land owner, FLC Board Member Buckeye Conservancy Vettersburg Mr. Peter Ribar Campbell Timberland Management Fort Bragg Mr. John Williams Environmental Resource Solutions Inc. Santa Rosa	The recovery strategy underestimates the role of voluntary measures and overestimates the regulatory approach.	The Recovery Strategy is emphasizes voluntary measures and incentives. Section 5.1 states that "Coho salmon recovery is dependent upon the role of private lands" and that "The Recovery Strategy seeks to achieve species conservation in ways which are consistent with private property rights." Range-wide and watershed specific recommendations (Chapters 9 and 10) emphasize public and private cooperation and voluntary actions in addition to compliance with existing laws and regulations.
181	Mr. Bernard F. Bush Director of Regulatory Affairs Simpson Resource Company Korbel Mr. Daniel G. Cohoon Professional Forester Fortuna	It is extremely disconcerting that little or no mention has been made of the restoration work and good land stewardship that has taken place on many of the private ownerships. Currently there is little or no incentive for landowners to participate in the recovery of the salmon when work that has been done is ignored and additional regulatory threats are proposed.	The CRT report to the Department (available on the Department website) contains a list that was compiled by members of the team which recognizes the voluntary restoration work and stewardship of private landowners. The Recovery Strategy has been amended to include a reference to this list.
182	Mr. Mark S. Rentz Vice President	The draft Recovery Strategy fails to adequately consider voluntary, incentive-based approaches to recovery with	The Department believes cooperation amongst the affected and interested parties is essential for coho

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Environmental and Legal Affairs California Forestry Association	regards to forestry and other resource based operations.	salmon recovery. The Recovery Strategy takes advantage of cooperative efforts wherever possible while also using appropriate land management and conservation practices and regulatory and protection activities. Timber Alternatives B and C incorporate voluntary, incentive-based approaches to recovery. The suggestion of implementing Alternative A and Sections 16,17 and 18 of Alternative B through incidental take permit guidelines (pursuant to FGC § 2112) is an incentive-based approach in that it streamlines the incidental take permitting process. The Commission has yet to determine what should be included in the Recovery Strategy for timber management.
183	Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway	Promote incentives (e.g., tax breaks) and use grant funding where possible; avoid regulation where possible.	The Recovery Strategy is emphasizes voluntary measures and incentives. It avoids regulation where possible, relying on enforcement of and improvement of implementation of existing laws.
184	Mr. Jeff Fowle Siskiyou County Farm Bureau Etna	Successful recovery of coho depends on trust between DFG, DWR and landowners.	Comment noted.
185	Mr. Felice Pace Klamath Forest Alliance Klamath Glen	Landowner “Incentives” must not pay for compliance with existing codes.	Incentives are provided to encourage actions for the recovery of coho salmon. CESA does not require any person to recover the species. Consistent with legally required restrictions on the application of restoration funding, the Department strives to fund both types of activities.
186	Ms. Pamela J. Nicolai General Manager Marin Municipal Water District	MMWD has long been involved in coho recovery projects and supports the efforts to develop the recovery plan. … We feel MMWD has implemented some model programs. We would like to feel that being mentioned so specifically throughout this document is a complement to	MMWD is identified specifically in three recommendations: - BM-WA-07 (original wording was changed as suggested) - Change BM-LA-05 as follows:

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		our good works. Instead, it leads us (and possibly many other agencies) to fear that those good works, instead of being rewarded, will now become mandates and that grant funding for those projects will be put in jeopardy because of those mandates. This approach would likely discourage any other agency from stepping forward to do projects for fear that it would become a mandate. A preferred role for DFG in this recovery plan would be for the agency to recommend or create incentives for agencies to engage in recovery projects perhaps by giving preference for grant funding to those agencies who voluntarily engage in recovery efforts.	- Continue ongoing efforts and support of stewardship in the basin beyond the 10-year SWRCB mitigation order that expires in 2007 … - Add MMWD as identified action entity under "Others" - Retain BM-LA-16 unchanged
187	Ms. Jene L. McCovey Native American Coalition for Headwaters Arcata	The Yurok Tribe's priority water right is dated by the creation date of the lower Klamath River Reservation. Any other water rights are subservient to that date. No incentives (AKA subsidies) should be given to agriculture and other industries if their water appropriations are after that of the creation date of the reservation.	Incentives are provided to encourage actions for the recovery of coho salmon. CESA does not require any person to recover the species.
188	Ms. Jene L. McCovey Native American Coalition for Headwaters Arcata	No money should be given to the timber industry, companies or private land owners who are not in compliance with forest practice rules, water conservation prescriptions which are promulgated to protect the quality of water and to preserve the quantity of water. There should be no monetary incentives given to individual land owners or corporations who habitually do not follow the rules and regulations (citations-fines) and/or who are not in compliance with court orders, i.e., over harvesting under sustained yield plans, cutting timber that was reserved as habitat buffer zones, and those rules related to conserving water, timely creating a plan for water conservation, update water delivery systems such as screens and leaking ditches.	Incentives are provided to encourage actions for the recovery of coho salmon. CESA does not require any person to recover the species. Consistent with legally required restrictions on the application of restoration funding, the Department strives to fund both types of activities.
189	Mr. Walter Epp	Cooperation is very desirable, but is not the goal, and is	The Department believes cooperation amongst the

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Oakland	not adequate by itself.	affected and interested parties is essential for coho salmon recovery. The Recovery Strategy takes advantage of cooperative efforts wherever possible while also using appropriate land management and conservation practices and regulatory and protection activities.
190	Ms. Noelle Cremers Director, Industry Affairs California Cattlemen's Association	CCA would like to see the Department work to include guidance to landowners that would explain how they can voluntarily assist in the recovery of coho.	Comment noted.
191	Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway	I applaud all the references to Incentives and suggest that an incentive task force be set up to pursue these. Considerations for the land stewards is quite important. Several watersheds that are owned in large acres, for long term ranch and timber production, may be in much better shape than those subdivided (with numerous roads, diversions, etc) – and of course all situations of land use contribute to watershed conditions (for better or worse).	Comment noted.
192	Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway	As many of our efforts, as groups, individuals, communities and networks, are in alignment and embracing Coho recovery, I request that you consider CLC and CSP collaborators in your efforts as agencies and professionals.	Implementation of the Recovery Strategy will involve all interested and affected individuals and organizations.
193	Mr. Ralph Modine Supervisor, 4th District Trinity County	We believe that incentive and education are the key elements of a recovery strategy and that regulation has proven expensive and disruptive while not achieving the desired outcomes.	Comment noted.
194	Mr. Ralph Modine Supervisor, 4th District Trinity County	Trinity County strongly supports the recognition that agriculture and forestry were preferred land uses for protecting salmon, over urbanization or industrialization. But we are concerned that the recommendations do not provide the incentives to assure that. We strongly support an emphasis based on working pro-actively with	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		landowners.	
195	Mr. Ralph Modine Supervisor, 4th District Trinity County	The following are incentives that should be included in the strategy: - Safe harbor provisions, similar to those contained in the federal Endangered Species Act, should be applied to coho habitat that is re-established by migration barrier removal. - State and local rules/regulations should be modified to encourage landowners to provide critical habitat improvements as soon as possible rather than to create regulations to force them to accomplish this.	The commenter refers to safe harbor provisions and critical habitat. These are concepts from the Federal Endangered Species Act and its implementing regulations. The recovery strategy emphasizes other incentives to encourage landowners to voluntarily take actions to improve coho salmon habitat; it does not create regulations forcing recovery.
5.3: ELEMENTS NECESSARY FOR RECOVERY - PRIVATE AND PUBLIC COOPERATION - OUTREACH AND EDUCATION			
196	Mr. Mike Strunk Sonoma County Farm Bureau Sebastopol	Landowners get scared about the State coming onto their property, even if the staff have good suggestions.	This issue was discussed by the CRT, which resulted in task XXX-C-02. This task speaks to data collecting and sharing on private lands.
197	Mr. Mike Strunk Sonoma County Farm Bureau Sebastopol	Need additional information on new ways of farming.	Comment noted.
198	Mr. Mike Strunk Sonoma County Farm Bureau Sebastopol	We need to have biologists to help the landowners.	Private and public cooperation and public outreach are identified as necessary elements of the recovery strategy. See Outreach and Education (Section 5.3; pages 5-21 to 5-23) and the following range-wide recommendations: RWVI-A-02C (page 9-8), RWXIII-B-01a.ii (page 9-10), RWXV-A-01b (page 9-11), RWXV-A-02b (page 9-11), RWXXII-A-04b (9-13), RWXXXIII-A-10b (page 9-24)
199	Mr. Sean O'Day Yager/Van Duzen Environmental Stewards Fortuna	Educate people to do the right thing.	Comment noted.
200	Mr. Darrel Sweet President	Collaboration needs to emphasize credibility with the locals, assessment, outreach to the public, and	Private and public cooperation and public outreach are identified as necessary elements of the recovery

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	California Cattlemen's Association Livermore	monitoring.	strategy. See Outreach and Education (Section 5.3; pages 5-21 to 5-23) and the following range-wide recommendations: RWVI-A-02C (page 9-8), RWXIII-B-01a.ii (page 9-10), RWXV-A-01b (page 9-11), RWXV-A-02b (page 9-11), RWXXII-A-04b (9-13), RWXXXIII-A-10b (page 9-24)
201	Mr. Ben Riggan Orleans	Develop more partnerships with local groups to empower them to get directly involved in coho recovery and monitoring. You are doing this, do it more.	Comment noted.
202	Mr. Harry Vaughn Eel River Salmon Restoration Program Miranda	Cooperation between restoration workers and land owners has been beneficial to coho salmon.	Comment noted.
203	Ms. Noelle Cremers Director, Industry Affairs California Cattlemen's Association	Outline a plan which would allow the Department to work with landowners who volunteer to incorporate strategy recommendations into their management practices and to gather data on how these practices actually provide benefits to the coho. Without a feedback loop it will be impossible to ever understand the needs of the species.	Assessment and monitoring will include the partnership and continued collaboration with private land owners. Data and information collected will be used both to improve recovery efforts (see Chapter 12) and evaluate the status of each coho salmon ESU (see Chapters 4 and 5). The Department looks forward to working with members of the CCA to better understanding and reporting the outcomes of land management practices on coho salmon recovery.
204	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	Education and empowering the riverine communities to become effective stewards of the ecosystem should be a centerpiece in recovering watersheds, particularly the declining fisheries resource.	The Recovery Strategy emphasizes cooperation and collaboration at many levels (e.g. Chapters 4 & 5).
205	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	The council recommends that the Department work closely with the other Klamath subasin groups as well as the Scott and Shasta groups, in the development , implementation, and monitoring the Recovery Strategy.	The Recovery Strategy emphasizes cooperation and collaboration at many levels (e.g. Chapters 4 & 5).
206	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	The Draft Strategy should include the Karuk Tribe's activity and they should be incorporated more in the planning, assessment, implementation and monitoring	It is the Departments intent to work with local people, land owners, tribes, groups, agencies and others in the implementation of the Recovery Strategy.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		activities that are proposed	
5.4: ELEMENTS NECESSARY FOR RECOVERY - PRIVATE AND PUBLIC COOPERATION - ASSESSMENT, MONITORING, AND RESEARCH			
207	Mr. Peter Ribar Campbell Timberland Management Fort Bragg	The recovery strategy uses outdated research from the 1960s.	The Department used the best available data in development of the Recovery Strategy. Use of 1960's and other historical data are pertinent to assessing population trends.
208	Mr. Sterling McWhorter Petrolia	The recovery strategy lacks recent numbers of spawners returning. Though unsure of the species, lots of fish are returning.	The Department used the best available information in developing the recovery strategy. Those issues are part of a status review, not a recovery strategy. The Status Review of California Coho Salmon North of San Francisco, A Report to the Fish and Game Commission, April 2002, provides the best available data on coho salmon populations. The need for more complete and recent data is addressed in Monitoring of Coho Salmon (Section 5.4.2, pages 5-29 to 5-30), and in Range-wide Recommendations (Section 7.23, pages 7-16 to 7-17).
209	Mr. Ben Riggan Orleans	Document more coho. To protect these fish we need to have a better grip on where they are and when.	Department fisheries biologists have conducted protocol surveys over the past several years to confirm the current distribution of coho salmon within the species' historical range. This information is summarized in the Status Review of California Coho Salmon North of San Francisco published in April 2002. Long term monitoring within the range of coho salmon will continue using available staff in order to provide data on progress toward recovery goals.
210	Mr. Sterling McWhorter Petrolia	Down-stream migratory traps show hundreds of fis h, showing there is habitat.	Downstream migrant traps are not species specific. In addition, timing and placement of traps often results in capture of young of the year, rather than smolting fish on their way to sea. These cases indicate spawning habitat but not necessarily over- summer or over-winter habitat.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
211	Gary, Karen, & Amanda Rainey Horse Creek	Use 'real' numbers of downstream migration of juvenile Coho in your study. Count numbers of upstream returning Coho at the mouth of the rivers.	The Department currently estimates the number of downstream migrants by sampling with a rotary trap. To determine the total number of coho salmon moving downstream, it's necessary to determine the catch efficiency of the trap. This is done by releasing a known number of marked fish upstream of the trap and recording the percentage recaptured. Trap efficiency is then used to estimate the total number of fish moving downstream past the trap. A video counting weir such as the one used at the mouth of Shasta River can be an effective way to monitor the number of returning adults. Weir operation requires good access to a location on the river that is well suited for a weir. We are fortunate to have this available to us at the Shasta River. Counting number of upstream returning coho salmon is less feasible where there are higher flows and a broad channel, such as the Scott River.
212	Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and Sonoma County Water Agency Walnut Creek	We appreciate the Department's recognition that a data collection and disclosure policy is needed to facilitate recovery. There are a number of agencies (Federal, State, local) that are collecting data important for protection and recovery of sensitive resources like coho salmon. Easy access and exchange of data will benefit everyone	Comment noted.
213	Mr. Doug Smith Humboldt Watershed Council Arcata	There needs to be a transparency of the data.	Recommendation RW-XXX-C-02 speaks to data sharing, storage and use.
214	Mr. Sterling McWhorter Petrolia	The NCWAP process used a flawed computer model and one condition could kick out a perfectly good stream as not being suitable. For example, Rattlesnake Creek should not have salmon, but in reality, it does.	Comment noted.
215	Mr. Brian Woolsey	Prior to the acceptance of a Coho Recovery Strategy,	The Department and recovery teams have worked

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Hydrologist/Geomorphologist Samoa	existing watershed data needs to be compiled in a database system and a synthesis needs to be completed on cumulative watershed health and the limiting factors on coho in these basins. Once all existing data are compiled and synthesized then recovery efforts and basin prioritization be completed efficiently.	with the best available data in preparing the Recovery Strategy, and the establishment and maintenance of a database/information distribution system is part of the Recovery Strategy (see Section 5.4 and table 9-1, pages 9-16 and 9-17). It would be too time-consuming to establish the system prior to initiating coho salmon recovery. The Recovery Strategy is based on a continual feed-back loop, with revision based on better information and better understanding of information (see Chapter 12). Therefore, as we understand water health and limiting factors better, we will be able to both re-evaluate priorities and improve recovery efforts.
216	Mr. Sean O'Day Yager/Van Duzen Environmental Stewards Fortuna	There needs to be long-term monitoring.	The Department envisions that monitoring of coho salmon status, trend, and recovery is a decades-long effort. The strategy is described on pages 5-23 to 5-31. Chapter 12 described the Department's commitment to maintain monitoring and use information to improve recovery efforts.
217	Mr. Don L. Neubacher Superintendent National Park Service Point Reyes	There is very little emphasis on long-term monitoring and how to track the long-term success of the program and species. Ongoing Monitoring programs should be identified and cited providing information vital to this planning program. In the long-term, such monitoring programs will be essential to our ability to assess whether we are able to achieve stated success criteria.	These issues are addressed in the monitoring Section 5.4.3 starting on page 5-27.
218	Mr. Chris Howard Simpson Resource Company Korbel	Watch populations for more time and take a hands-off approach. Maybe populations are turning around on their own.	The Department, in cooperation with private landowners and watershed groups, has completed many successful salmonid restoration projects which include instream habitat, fish passage modification, culvert replacement and watershed protection through road decommissioning, just to name a few. Many private companies, including Simpson Timber Company, and watershed groups have monitored

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			salmonid populations and data indicate coho salmon populations are more abundant and less fragmented in certain coastal watersheds within the marine influence in the SONCC Coho ESU. There are other situations where coho salmon populations are isolated or clustered and fragmented from other suitable streams within a large watershed. After extended monitoring, the Department may, with consensus by NOAA fisheries, reintroduce coho salmon to adjacent historical streams within the same watershed, where applicable. This management option is intended for specific finite situations where coho salmon do not unilaterally respond to restored or suitable habitats of historic streams.
219	Mr. Denver Nelson Eureka	Not enough details of monitoring of project implementation and effectiveness.	All recommendations were developed with feasibility and effectiveness in mind. Chapter 12 describes the timetable, process, and adaptive management approach for evaluating the progress and effectiveness of recovery actions individually and in total. Additionally, the Department intends to implement a monitoring program which will, in part, specifically address the effectiveness of actions and activities taken to recovery coho salmon (see ages 5-29 to 5-30, 7-16, 9-16 to 9-17, and 12-6).
220	Mr. Peter Ribar Campbell Timberland Management Fort Bragg	Effectiveness monitoring of the actions taken for recovery should include marine production.	The relationship of recovery actions and ocean conditions is addressed in the Recovery Strategy. See range-wide recommendation RW-XXIX-B-03 (page 9-16) and RW-XXIX-F-01 (page 9-17).
221	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	Need a strategic monitoring, the equivalency of TMDL.	The Department has outlined an assessment and monitoring program for coho salmon recovery (see Chapter 5) to meet §2109(c) (6)(C). This program is envisioned to be part of a coastal monitoring effort.
222	Mr. Patrick Higgins Consulting Fisheries Biologist	Need to monitor V-star and turbidity.	The Department concurs. See table 5.1, pg. 5-25.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Arcata		
223	Ms. Chrissie Ishida Copco Lake	Also, by what measurement will we know if we are succeeding? How many fish coming back will let us know if all these efforts are paying off? A lot of hard work and dedication on a lot of people's parts are being given here and how will we know when we're winning.	The measurement of full recovery for such a diverse, wide-ranging aquatic organism with both marine and freshwater phases is very difficult. Annual monitoring of the number of coho salmon present in all streams is not possible and could be detrimental to the fish and their habitat, in and of itself. With these challenges in mind, the Department believes that stratified random sampling programs such as implemented in Oregon will adequately measure population trends, viability, and results of habitat restoration efforts.
224	Mr. Mike Strunk Sonoma County Farm Bureau Sebastopol	In favor of incentive-based research. Get agriculture and forest landowners to buy into it.	The Department recognizes the importance of both landowner buy-in and research. The Department specifically acknowledged the need to work together with owners of forest and agricultural lands (see pages 5-10 and 5-21). See pages 5-23 to 5-30 for a discussion of research and page 7-16 for recommendations for research.
225	Ms. Noelle Cremers Director, Industry Affairs California Cattlemen's Association	It is important for the Recovery Strategy to include guidance to landowners so they can play a part in assessment, monitoring, and research regarding the coho salmon. The Department needs to outline how landowners can assess fish numbers and how landowners can monitor habitat features. There is a great need for guidance so that willing landowners can provide the information necessary to truly understand the current status of the coho salmon. The Department should have used the Recovery Strategy to build a foundation to gather future data and develop tools landowners can use to improve coho habitat. Instead the Department built a skyscraper of often unfounded information without the support of a foundation of guidance.	The Department has habitat monitoring protocols and guidelines and has worked with landowners to train landowners in assessing salmonid habitat. The Department has also been working with private landowners for several years to monitor fish habitat and populations. Additionally, the Department's Fisheries Restoration Grants Program is funding projects to monitor salmon and habitat on private lands. Lastly, pages 5-23 to 5-31 outline the foundation for future assessment and monitoring, both of salmon habitat and populations. The Department looks forward to working with members of the CCA in assessing and monitoring coho salmon populations and habitats.
226	Mr. Darrel Sweet	Start with the RCDs and with assessment. There are	Comment noted. For range-wide assessment, see

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	President California Cattlemen's Association Livermore	existing models on how to start watershed groups. There are already collaboration efforts to assess specific problems and work on them. Better work gets accomplished with collaboration.	pages 5-23 to 5-30 for discussion and pages 9-16 to 9-17 for recommendations.
227	Mr. Bernard F. Bush Director of Regulatory Affairs Simpson Resource Company Korbel	The plan should include an appropriate level of monitoring to acknowledge what works and what doesn't before committing billions of taxpayer dollars.	The assessment and monitoring program proposed in Chapter 5 would have several levels of monitoring-from the ESU down to stretches of stream where restoration or enhancement activities were being implemented. Effectiveness and validation monitoring should provide information of the effectiveness of activities in restoring habitat and response of coho salmon, respectively.
228	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	Realistic funding levels are necessary for DFG to conduct recovery monitoring. It is unrealistic to ask for public-private partnerships if DFG can't provide funds for needed monitoring.	Comment noted.
229	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	Pg 5-23 5.4 Assessment, Monitoring and Research This should be the most important section in this entire recovery plan. We appreciate the attention the department has given to this important issue, however we believe it should be the first and foremost item that has the most attention and action paid to it.	The Recovery Strategy has been amended to address this comment and the issue has been elevated to the Executive Summary.
230	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	Pg 5-28 5.4.3.1 Three-tiered Monitoring Framework The department discusses the Oregon Plan and credits Oregon for successfully implementing a quality monitoring program. We recommend the department take even a closer look at the Oregon Plan and model California's Recovery Strategy on it. Rather than taking a regulatory, costly approach, Oregon embarked upon a reasonable and sound path of recognizing they needed more information. In addition, rather than create a huge bureaucracy and regulatory system, they work with local groups to perform the monitoring as well as implementing reasonable, cost efficient, logical	We agree that working with local groups is paramount for successful recovery of this species and have developed a voluntary, incentive-based recovery strategy. California (Department and NOAA Fisheries) is currently in the process of adapting the Oregon Plan to fit the California environment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		restoration projects. By doing this, Oregon is getting a better handle on how many coho they have, how many they need, how much habitat they need to sustain a viable population and even what a viable population is. In addition, they have a coho fishery. California should replicate the Oregon Plan rather than another regulatory boondoggle. (See Article and Counts from Oregon).	
231	Mr. Richard Ridenhour McKinleyville	Most of the recommendations seem appropriate, but many require further studies to specifically identify and prioritize what should be done or call for the development of further plans or actions. Until these next steps are accomplished, evaluation of what is proposed must be equally generalized.	See pages 5-23 to 5-31 and Chapter 12 for the processes of gathering and analyzing additional information and revising the recovery effort, respectively. Also, many of the watershed-specific tasks are presented in a step-wise fashion, with information gathering occurring prior to actions being taken. In addition, pages 6-87 to 6-105 and the implementation tables include the Department's and recovery teams' initial prioritization, based on current information.
232	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	The council recommends the Department join them and others in developing a process for promoting a coordinated strategy for research, monitoring, and assessment actions that are completed, taking place, or proposed. The council would like to explore the above activities with all of the stakeholders related to the mainstem Klamath subbasin	The Recovery Strategy emphasizes cooperation and collaboration and the Department wishes to cooperatively work with a variety of stakeholders in those activities.
5.5: PRIVATE AND PUBLIC COOPERATION - REGULATORY ROLE IN RECOVERY			
233	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	The document does not acknowledge the overlapping shared interests, legislated mandates, and regulatory authorities of the CDFG and three Regional Boards. The North Coast Regional Board has a clear interest, regulatory authority, and responsibility in many of the issues raised in the Recovery Strategy, including spawning gravel quality, habitat complexity, riparian enhancement and protection, large woody debris	The regional boards were represented on the CRT by the SWRCB and contributed to all recommendations and tasks. The Department and recovery teams can work with the commenter in the ensuing years as the Recovery Strategy is implemented to revise tasks as appropriate.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		loading, sediment source identification, and irrigation tailwater issues. The issue is perhaps most striking in the Shasta-Scott Pilot Program recommendations detailed in Table 10-1 where "identified action entities" accompany each recommendation. In most cases, there is no acknowledgement that Regional Board staff are currently working on projects that directly relate to the actions identified in the recommendations. For instance, recommendation *Scott HM-4b* identifies development of a sediment budget as a short-term action. The recommendation fails to mention that Regional Board staff are currently developing a sediment source analysis for the Scott River, nor does it identify the Regional Board as an "action entity." We believe there are many opportunities to make our programs align better, and that improved alignment can lead to increased effectiveness for all our organizations in these areas of overlapping interests and responsibilities. The Recovery Strategy does not appear to acknowledge CDFG's own authorities with respect to many of the issues and recommendations contained in the document. Examples of FGC sections that appear applicable include Sections 5901 and 5948. Identifying specific actions that CDFG is committed to implementing given its authorities and mandates would materially strengthen the document.	Comment noted.
234	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	Table 5-2:- page 5-33. Under Porter-Cologne Act: "Requires persons proposing to discharge waste that could affect the waters of the state to file a Report of Waste Discharge with the appropriation <u>appropriate</u> ~~appropriation~~ Regional Water Quality Control Board". - page 5-34. Under California Environmental Quality Act: "Requires environmental review and public disclosure <u>of environmental impacts</u>."	The Recovery Strategy has been amended to address the comment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
235	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	The comments for TMDLs are inaccurate. TMDLs called out in the USEPA consent decree covering the North Coast Region must be completed by 2007, but this is not all TMDLs in the Region, nor the State.	The Recovery Strategy has been amended to address the comment.
236	Mr. John Ricker County of Santa Cruz	P. 5-35 There is mention of some local laws , but many are left out. Santa Cruz County has a number of applicable regulations, including the Riparian Corridor Protection Ordinance (County Code Chapter 16.30).	Included in Table 5-2: Laws and Regulations - Santa Cruz County Riparian Corridor Protection Ordinance, County Code Chapter 16.30. General Description - Defines, protects and determines boundaries of riparian corridors for permits and exemptions.
237	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	I would like the following recommendation added: Appropriate Federal, State and county agencies shall fully utilize all existing laws including but not limited to: DFG stream bed alteration permitting (1600 process), coastal zone ordinances, State Lands Commission regulations, county ordinances and any other legal means to prevent removal of large woody debris (LWD) within the 100 year flood plain with the intent of protecting habitat for the benefit of coho salmon. No LWD should be removed unless it is allowed for health and or safety purposes under existing law. Any legal removal of LWD should be fully mitigated. Illegal removal of LWD should be prosecuted to the full extent of the law. Any resultant fines should be allocated to mitigate the loss of LWD and expedite coho recovery. Fines should be set high enough to fully mitigate any damage to coho habitat and cover all costs of enforcement and prosecution.	This recommendation did not receive a consensus vote from the CRT. The Department believes that the issue of LWD removal is adequately covered under the Enforcement Recommendations. However, Section 7.20 (Enforcement) (specifically recommendation RW-XXXIII-A-01) has been amended as follows to specifically acknowledge that existing laws should be enforced to protect instream LWD. "Support enforcement of existing laws, codes, regulations, and ordinances that address the protection of coho salmon and their habitat. Habitat includes but is not limited to water (quality and quantity), pools, riffles, instream LWD, riparian vegetation, and estuaries. …" In addition a new recommendation has been added to Section 7.7 (Large Woody Debris) to acknowledge the importance of protecting instream LWD. "Encourage federal, state, and county agencies and private landowners to protect instream LWD to the greatest extent practicable without endangering public safety, life or property."

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			Recommendations RW-XXXIII-A-07 and RW-XXXIII-A-08 address the issue of fines and penalty schedules.
238	Mr. Felice Pace Klamath Forest Alliance Klamath Glen	In the final Recovery Strategy, the Department needs to specify how it is going to improve compliance, work with the attorney general, local DAs' environmental prosecutors. And how it will enforce all codes.	See Section 7.20. For example, RW-XXXIII-A-01 provides that enforcement of existing laws involves education, warnings, citations, and developing cases for referral to district attorneys offices and/or the Office of the Attorney General. Other recommendations include continued funding for the California District Attorneys' Association's Environmental Circuit Prosecutors program and/or Environmental Project; an outreach and education program that targets agency personnel, judges, district attorneys, and the Attorney General's Office among others; establishing environmental task forces; and increased funding for the Departments' CALTIP program.
239	Mr. Felice Pace Klamath Forest Alliance Klamath Glen	Use Department personnel to better enforce existing regulations.	The Recovery Strategy calls for enforcement by all regulatory agencies of existing laws that would benefit coho salmon. See Section 7.20. In so far as this recommendation concerns the Department, this will involve the use of Department personnel.
240	Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway	Several people, some of whom were on the CRT, say that there were no regulations, or certainly not enough, proposed. Environmentalists highlighted the fact that the words were much more loose than could be counted upon to make a difference to implementation of Coho Recovery. The use of the words "develop" and implement" are certainly stronger than "assess", "increase", but without concrete targets and strong intent for funding and enforcing existing and new-but-necessary regulations, Coho will not recover. Since we are starting this stricter process many years after the declines in populations, we have an uphill battle, and must seek to do the utmost in due diligence.	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
241	Mr. Aaron Peters Chairman Quartz Valley Indian Reservation Fort Jones	We understand that the Recovery Strategy is optional and voluntary. We also understand that in order to receive an Incidental Take Permit, the Recovery Strategy's recommendations must be followed. If there is no measurable improvement in coho habitat and population after a reasonable amount of time, we feel that the state needs to get tough and stand behind these recommendations through enforcement.	The Department believes that both cooperation and enforcement are essential to recovering coho salmon. The Department issues incidental take permits in accordance with the issuance criteria found in FGC § 2081(b) and Title 14, § 783.4. Specifically, the project must be an otherwise lawful activity (i.e., in compliance with existing laws, codes and statutes) and the impacts of the taking must be minimized and fully mitigated. The Department enforces existing laws and regulations under its authority and encourages other agencies to use their authorities to enforce existing laws and regulations under their respective jurisdictions.
242	Mr. Dave Hillemeier Fisheries Program Manager Yurok Tribe	The public draft document is full of incentive based/voluntary language. Of course, voluntary actions to meet the recovery needs of coho salmon are preferred, as long as they work. To date, we've seen few voluntary efforts that address the critical issues, such as ensuring enough water is left in a stream. Therefore, it is imperative that as incidental take permits are issued regarding the take of coho salmon, that they be based upon actions that actually result in the recovery of coho, and on compliance with existing laws, codes, and statutes; not merely the participation in a process or the conduct of a study that may eventually lead to coho recovery.	The Department issues incidental take permits in accordance with the issuance criteria found in FGC § 2081(b) and Title 14, § 783.4. Specifically, the project must be an otherwise lawful activity (i.e., in compliance with existing laws, codes and statutes) and the impacts of the taking must be minimized and fully mitigated. In the specific instance of a proposed incidental take permit for agricultural activities in the Shasta and Scott valleys, the Department will consider the recommendations of the Recovery Strategy in developing the specific actions it believes will be required to minimize and fully mitigate the take of coho salmon.
243	Mr. Peter Ribar Campbell Timberland Management Fort Bragg	The Department needs to reprioritize its efforts and focus on programmatic permitting processes and approaches (e.g., for larger properties, water drafting), and the use of categorical CEQA exemptions. In addition, the Department should act as a clearinghouse for facilitating consultation with other state and federal agencies	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
244	Mr. Daniel G. Cohoon Professional Forester Fortuna	Evaluation should be made of the regulatory process to determine which, if any, of the regulations, mitigations and protection measures imposed on the landscape have been successful in restoring and actually maintaining salmon habitat. There has been little or no science included with the establishment of these regulations and the evaluation of their success in achieving their stated purpose has been severely lacking.	FPRs adopted, in part, specifically for the benefit of anadromous fishes, including coho salmon (e.g., FPR 916.9, 936.9, 956.9. Protection and Restoration in Watersheds with Threatened or Impaired Values) have only been in effect since 2000. People involved in forestry generally agree that although these new rules reduce some of the site-specific impacts which resulted from timber operations conducted under prior regulatory requirements, there has not been sufficient time to determine if there have been benefits to coho salmon. Under the Threatened and Impaired Watershed Rules there may be short term adverse impacts to coho salmon habitat, but there is considerable existing information to infer that the retention of more riparian overstory canopy, including large conifers, and the reduction of sediment inputs into watercourses, will lead to long term improvements in habitat condition. However, there has not been sufficient time to measure coho population response.
245	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	Pg 5-31 5.5 Regulatory Role in Recovery As you can see from this detailed list of existing laws and regulations, coho have an extensive group of regulatory protections already in place. No more are needed. Reasonable and feasible enforcement of existing laws will assist in recovery of coho.	Comment noted.
246	Mr. John Williams Environmental Resource Solutions Inc. Santa Rosa	More command and control will not solve the issue of recovering coho salmon.	Comment noted.
247	Ms. Linda Falasco Executive Director California Materials Association of CA Sacramento Mr. Peter Ribar	The Recovery Strategy should only make recommendations, not require certain practices or regulation. The Recovery Strategy should rely on incentives and non-regulatory approaches in order to foster cooperation	The Recovery Strategy is non-regulatory, in accordance with FGC Code § 2114, and emphasize cooperative, incentive-based approaches.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Campbell Timberland Management Fort Bragg Mr. Peter Parker Forest Landowners of California Sacramento	with landowners on whose property the efforts will be focused. **We…reject a regulatory solution to coho habitat restoration.** Only through a cooperative effort including incentives, education, the enforcement of existing rules and easement purchases from willing sellers will the job of coho restoration be achieved.	
248	Mr. Bernard F. Bush Director of Regulatory Affairs Simpson Resource Company Korbel	The Pubic Review Draft represents business as usual- an emphasis on regulations rather than incentives.	We consider the development of this Recovery Strategy a deviation from business as usual, as it seeks to recover the species though an approach that emphasizes voluntary measures and incentives. In addition, the Recovery Strategy calls for enforcement of and improvement in the implementation of existing laws, which was endorsed by the CRT. No new regulations, except for proposals to the Commission in Alternatives A and B for timber management, were included in this strategy. The Commission has yet to make any determination on the Recovery Strategy, including possible new regulations or incidental take guidelines for timber management.
249	Mr. John Williams Environmental Resource Solutions Inc. Santa Rosa	Rural landowners in California are being hit with regulations by State and federal agencies; cumulative effects of these are deadly for forest managers. The must be careful with incentives and disincentives. People will respond. Regulations will drive people off the land, resulting in higher density of people and land use.	Comment noted.
250	Mr. John Williams Environmental Resource Solutions Inc. Santa Ros a	The net result of more regulation coming from the recovery strategy could be forestry becoming uneconomic in California for landowners. This is not in the best interest of California.	Comment noted.
251	Ms. Sally French Land owner, FLC Board Member	Any new regulations cost us more money and are putting us out of business. How do you know that the	We agree that working with local groups is paramount for successful recovery of this species and have

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Buckeye Conservancy Vettersburg	new regulations proposed will be effective if their result is to speed up the subdivision of ranches and forestland?	developed a recovery strategy that emphasizes voluntary measures and incentives. In addition, the Recovery Strategy calls for enforcement of and improvement in the implementation of existing laws, which was endorsed by the CRT. No new regulations, except for proposals to the Commission in Alternatives A and B for timber management, were included in this strategy. The Commission has yet to make any determination on the Recovery Strategy, including possible new regulations or incidental take guidelines for timber management.
252	Mr. Jeff Fowle Siskiyou County Farm Bureau Etna	Further regulation and fee assessment on Agriculture and Timber will have negative effects on recovery. A healthy agricultural community (including timber) is an integral part of Siskiyou County's economy and the recovery of fish.	Comment noted.
253	Mr. Mike Strunk Sonoma County Farm Bureau Sebastopol	The agricultural community supports the program but don't want to be regulated to death.	Comment noted.
254	Mr. Ralph Modine Supervisor, 4th District Trinity County	We encourage the Commission to create a similar atmosphere [to the state of Oregon] of beneficial approaches for a variety of habitat needs which do not have to be based on grants but rather on reduced regulatory requirements.	Comment noted.
255	Ms. Chrissie Ishida Copco Lake	It is incredibly frustrating to have these laws or listings made by people who don't know the sacrifices people make here voluntarily all the time.	The Department works with watershed groups in both rural and urban settings, and we concur that resource funding is generally easier and more abundant in urban environments. The Department respects and appreciates the private entities that have participated unilaterally, as well as cooperatively to improve fisheries resources through habitat improvement. The Recovery Strategy for Coho Salmon was developed with input from representatives of local individuals and organizations to implement a cooperative approach to

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			resource management and a plan to develop incentives when economic and resource values may conflict. The Department strives to develop working partnerships with public and private entities for aquatic resource improvement. We acknowledge that there are many entities with different resource values, but we believe that a collaborative effort to develop a common working plan for resource values is possible.
256	Mr. Sterling McWhorter Petrolia	Are landowners liable for the results of restoration?	The ultimate results of restoration include recovery of coho salmon and delisting of the species. Until such time as the species is delisted, to the extent restoration results in the presence of coho salmon, all persons including landowners will be prohibited from unlawfully taking them.
257	Mr. Wesley Anderson Humboldt-Del Norte Counties Cattlemen's Association Loleta	We are concerned that this document might be the seed for legislation limiting land use and imposing land use management practices.	The Department recognizes the importance of both landowner buy-in and research. The Department specifically acknowledged the need to work together with owners of forest and agricultural lands (see pages 5-10 and 5-21).
258	Mr. Felice Pace Klamath Forest Alliance Klamath Glen	The Recovery Strategy may be illegal because there is no balance between regulatory and voluntary actions. There is nothing on regulatory compliance. Nothing about FGC 5937. The Recovery Strategy is paying for regulatory compliance, which is illegal.	The Recovery Strategy represents an equitable apportionment of public and private and regulatory and nonregulatory obligations, as required by Section 2111 of the Fish and Game Code. Because the California Endangered Species Act does not require any person to recover coho salmon, the Recovery Strategy emphasizes voluntary actions, incentives, and cooperative approaches. Consistent with legally required restrictions on the application of restoration funding, the Department strives to fund both types of activities. However, it calls for enforcement and improved implementation of existing laws that may benefit coho salmon.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		6: RECOVERY UNITS AND WATERSHEDS	
259	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	Pg 6-1, Chapter 6 Recovery Units and Watersheds. Is a Recovery Unit (RU) a mini-ESU? What are the implications of recovering one RU and not another within a watershed? What is the basis biologically for establishment of an RU?	State and federal listing and delisting is at the ESU level. Federal recovery plans also use the concept of a recovery unit; that is a group of ecologically-related watersheds to which the recovery criteria will be applied. Populations of organisms (fish included) are made of genetically related sup-groups, which are typically adapted to the local environmental conditions. Maintaining such inherent genetic diversity in a population buffers the species from stochastic events, including climatic change for example. Using the best available data, we grouped like watersheds together into recovery units. The concept of a recovery unit allows flexibility across the landscape; e.g., recovery does not have to happen in all 10 streams within a recovery unit, but only in 8 of the 10 streams. Once a recovery unit has met and sustained the recovery targets, more attention will be focused elsewhere (areas that have not met targets).
260	Mr. Harry Vaughn Eel River Salmon Restoration Program Miranda	Correction: Figure 6.12. Map of historic distribution of coho salmon. The North Fork has a waterfall and coho salmon are not above this barrier.	Maps of historic distribution were generalized by stream system without endpoints on coho salmon distribution because of insufficient information. New maps of current coho salmon distribution have been substituted for these maps in the Recovery Strategy, as we have specific information on where coho salmon have or have not been found in recent surveys.
261	Mr. Don L. Neubacher Superintendent National Park Service Point Reyes	Within Chapter 6, there are not citations or sources attributed to the watershed specific information. The plan should provide complete watershed information, including coho salmon resources, as well as monitoring programs that are established and ongoing in the area. In addition, development of a bibliography for each HSA would be a significant resource to land managers and	The Recovery Strategy was prepared in compliance with information requirements set forth in FGC § 2109. While the Department agrees that better citations, more complete watershed information, and a bibliography would be beneficial, there was not enough time to include this level of detail in the strategy.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		organizations working towards the protection and recovery of these species.	
262	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	Are the stream reach miles accurate and how were they developed? For example, I know of several barriers above which coho habitat is mapped in the plan (not just in the Big Basin HU, but also in other HUs). I recognize the importance of headwater areas in hydro/geo/ functions, but if analysis of anadromy and restoration is based on entire stream reach miles from GIS then analysis may be skewed. Further elaboration on mapping/financial/recovery needs analysis ought to be included in the final plan.	Stream reach miles are believed to be accurate by Department biologists and were developed by a consulting firm using habitat typing. Reference: D.W. Alley & Assoc. 2002. Comparison of juvenile steelhead densities, 1997-2001, in the San Lorenzo River and tributaries, Santa Cruz County, California; with an estimate of juvenile population size and an index of adult return. Draft report prepared for the following agencies: City of Santa Cruz Water Department, San Lorenzo Valley Water District, and the National Marine Fisheries Service. Project No.: 150-06.
263	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	Considerable effort was expended in the North Coast Watershed Assessment Program's assessments in Redwood Creek and the Mattole, Gualala, Albion, and Big Rivers. While it appears that information from the Mattole assessment was used in developing the Recovery Strategy, information from the other assessments should be incorporated into this plan.	The Gualala and Redwood assessments were utilized in development of the Recovery Strategy. The Big and Albion assessments will be used as the Recovery Strategy is updated.
		6.1.2: SMITH RIVER HYDROLOGIC UNIT	
264	Mr. Chris Howard Simpson Resource Company Korbel	There is coho salmon population information from Mill Creek for over 10 years. In the last few years, all cohorts are increasing. Recovery may be occurring now, without new regulation.	Although coho salmon numbers may have increased in last few years in Mill Creek, increasing trends over a longer time period and for many more streams would be necessary before it can be concluded that recovery is occurring in the ESU. The Commission has determined that listing of coho salmon as threatened in the SONCC range in California is merited based on their distribution throughout the ESU. Recovery of coho salmon in the state will be based on improved distribution and abundance throughout the ESU, not in a few drainages. Increases in coho salmon numbers in Mill Creek are a step in the right direction and may

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			have been enhanced, in part, by habitat improvements already implemented by the landowner and the CCC.
265	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	Eighty-five percent of Wilson Creek's timber has been harvested. The Public Review Draft does not indicate that it is dry due to aggradation, especially in downstream areas. This basin is a humpty-dumpty and should not be a high priority. There are problems in Klamath River tributaries too.	Despite harvesting and aggradation, Wilson Creek has a persistent coho salmon population as evidenced by regular presence of juveniles in stream surveys from 1995-2000. Wilson Creek was among the streams given the highest rating for "Restoration and Management Potential" in the SONCC using a model that takes into account population levels, risk, and watershed condition (See Figure 6-27). Wilson Creek is considered by Department fisheries biologists to be a stream with populations to be Maintained and Improved (see Key Streams list in Appendix D). Some improvements have been made with projects involving riparian conifer planting and LWD structure placement. The stream would benefit from upslope practices designed to reduce the sediment delivery to the stream and placement of more structures in aggraded downstream areas. The second paragraph of the Watershed Summary for Wilson Creek (page 6-13) was modified as follows: ~~Although adult coho salmon have not been observed during spawning surveys,~~ **Coho salmon** juvenile~~s/~~ ***and*** smolts ~~are~~ **have been** found ~~frequently~~ in **appreciable numbers during Wilson Creek** ~~juvenile~~ dive counts and electrofishing **from 1995-2000** ~~within Wilson Creek~~. Their numbers ~~, however, are very low~~, **have been highly variable with strong years from 1995-98 and weak years from 1999-2000,** which may ~~factor into~~ **have been related to** low observed adult escapement numbers (SRCO 2002).
6.1.3: KLAMATH RIVER HYDROLOGIC UNIT			

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
266	Mr. Dave Hillemeier Fisheries Program Manager Yurok Tribe	The document does a pretty good job of covering water issues in the Klamath River Basin.	Comment noted.
267	Ms. Jene L. McCovey Native American Coalition for Headwaters Arcata	The Copco Dam water is black, dark brown. The water looks dead with no reflection of the sky. The water in the riffles is brownish green. There is so much pollution in the water. It is not until Happy Camp does the Klamath River begins to clear up. Are the Scott and Shasta Rivers dead? Is it feasible for recovery in these streams?	Generally suspended sediment and algae are responsible for brownish and green coloration of Klamath River water. In addition to Range-wide tasks regarding 'Pollutants' and 'Sediment' (pages 9-8 and 9-9) there are Watershed-specific tasks to address sediment and water quality in the Klamath basin above Happy Camp (See for example, KR-HU-10, KR-HU-15, KR-SV-02, KR-SV-04, KR-BC-05, KR-HB-01, and KR-IG-01). The Scott and Shasta Rivers produce significant numbers of coho salmon of a relatively unique stock coming from adults that migrate long distances upstream from the ocean in order to spawn. The Department believes these streams have good potential for recovery, and so, has worked with the Shasta Scott Recovery Team to develop a pilot project for coho salmon recovery. The Shasta Scott Pilot Project also contains tasks addressing sediment and water quality (See for example – Task number P-2, MA-1a, and MA-1d on pages 10-46 to 10-50 and SS-HA-07 page 9-58)
268	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 6-14, Section 6.1.3 Klamath River Hydrologic Unit The first paragraph, third sentence should be corrected to read: "On average, approximately 289,000 acre feet of water are diverted from Upper Klamath Lake and the Klamath River to provide irrigation deliveries to 176,000 acres of farmland within Reclamation's Klamath Project. An additional 44,000 acre-foot of water are diverted to serve 28,000 acres of land in the Lower Klamath Lake Wildlife Refuge. Approximately 16% of the diverted water is returned to the Klamath River in a slightly more	The Recovery Strategy has been amended to address the comment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		nitrified state during some months of the year. The return water represents approximately 9% of the water passing through the Keno dam." (Data provided by Reclamation, Klamath Basin Area Office).	
269	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 6-14, Section 6.1.3 Klamath River Hydrologic Unit - Third paragraph, third sentence should be corrected to read: "Habitat alteration both inside and outside of the Klamath Project, along with the introduction of Blue-Green algae around the turn of the century, have degraded Klamath River water quality. Conversion of open water areas and wetlands into agriculture around both Upper and Lower Klamath Lakes has increased the total amount of available water. These conversions and the construction of the Link River Dam have changed both the timing and duration of water flows down the Klamath River. In general, these alterations have provided lower flows during the late spring and early summer and higher flows from August through March in most years." (Data provided by Reclamation, Klamath Basin Area Office.)	This paragraph is intended to provide a general overview of the historical changes that have adversely affected conditions for anadromous fish in the Klamath River. Its focus is not limited to the Klamath Project. Before accepting the proposed revisions regarding water availability and wetland conversion, as well as the changes in historic flow regimes, the Department would need to be provided with peer reviewed documentation supporting these statements.
6.1.4: SALMON RIVER HYDROLOGIC AREA			
270	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	Modify list of coho streams in the Salmon River. To be added: St. Claire, Black Bear, Indian, East Fork of Knownothing, and Specimen (trib to Little North Fork) creeks. Area to be subtracted: Not past Big Flat in the Upper South Fork of the Salmon River	The Department used the best data available which indicates that St. Claire, Black Bear, Indian, and Specimen (tributary to Little North Fork) creeks are not steams likely to support coho salmon. However data to the contrary can be sent to the Department for consideration in updates of the Recovery Strategy. Comment regarding the representation of South Fork Salmon River not extending past Big Flat has been incorporated into the final document.
6.1.6: SCOTT RIVER HYDROLOGIC AREA			
271	Mr. Neil Murdock	Having a nearly 50 year connection and residence in the	The Recovery Strategy calls for focusing cooperative

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Fort Jones	Scott Valley, I fear that a number of the local organizations are merely paying lip service to conservation in the (hopefully vain) hope that their current difficulties will go away. I personally welcome the Coho listing if only it will force a more rational use of water resources.	efforts on the rational use of water resources. Local organizations can be very effective at raising the awareness and urging landowner participation in programs that result in sustainable use of resources for economic rural and urban communities as well as protection of the public trust resources (fish, wildlife, and plant communities) that are under the Departments' charge. We acknowledge that there are many entities with different perspectives on resource values. However, we believe a collaborative effort in the development and implementation of a common strategy has a good chance at succeeding over the long term necessary for recovery. The Department also has hope that with increased participation and cooperation across all groups, the long term intrinsic value of resources that are maintained for reasons other than monetary may be passed on to future generations.
		6.1.9: REDWOOD CREEK HYDROLOGIC UNIT	
272	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	Section 6.1.9 Redwood Creek Hydrologic Unit (page 6-33) Emerald Creek (a.k.a. Harry Weir Creek) is not mentioned as being within the historical coho range. Emerald Creek, within the Orick HSA, had coho present when sampled in 1980, 1981, and 1994 by the park. Also, historical accounts had coho juveniles present on the mainstem of Redwood Creek.	The third paragraph of Section 6.1.9 Redwood Creek HU (page 6-33) has been modified to include Emerald Creek (a.k.a. Harry Weir Creek) as one of <u>five</u> tributaries within RNSP boundaries with coho salmon present. The following sentence has also been added: "<u>Historic presence of coho salmon juveniles has also been noted in the mainstem of Redwood Creek</u>".
273	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	Figure 6-10: Redwood Creek and Trinidad Hydrologic Units (page 6-35) A small dam that was associated with the former Prairie Creek Hatchery still exists on lower Lost Man Creek within the Orick HSA. Though the boards are removed, the remnant structure is a partial fish barrier at certain flows. The map presently has no dam for Redwood Creek.	The dams indicated on HU maps are major dams that represent barriers to anadromy. Partial barriers were not indicated on any of the maps. However, a sentence has been added to the last paragraph of Section 6.1.9 Redwood Creek HU (page 6-33) as follows: "<u>The remaining structure of a small dam that was</u>

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			associated with the former Prairie Creek Hatchery acts as a partial fish barrier at certain flows on Lost Man Creek within the Orick HSA."
274	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	Timber production is noted as the primary private land use activity. More to the point, timber harvesting activities are a significant land use activity. In addition, livestock grazing occurs on some of the largest private parcels. Livestock grazing, while less extensive than timber land management, should not be neglected in the recovery plan and follow-up activities. The document notes that much of the lower basin is managed for protection and restoration of old-growth redwood forest habitat. It would be more accurate to state that remnants of old-growth redwood habitat comprise a small but significant portion of the lower watershed, and are managed for the protection and restoration of this habitat and the adjacent public lands. The document notes that Redwood Creek is listed under the Clean Water Act Section 303(d) as impaired for sediment and temperature, because of impacts to beneficial uses of water, including cold water fisheries migration, spawning, and rearing. In 1998, the United States Environmental Protection Agency (USEPA) established Total Maximum Daily Loads (TMDLs) for sediment for Redwood Creek. TMDLs identify, among other elements, sources of impairment. SWRCB/NCRWQCB have not yet approved an action plan for implementing a TMDL strategy for the Redwood Creek watershed. We encourage CDFG to work closely with the SWRCB/RWQCB toward adoption and implementation of these action plans, to help ensure both coho recovery and water quality attainment. Channel aggradation is listed among the potential	Comments noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		problems for coho salmon recovery. It is important to note that severe historic aggradation, followed by ongoing aggradation from current land management makes for two distinct sets of problems: continued impacts to habitat and hydraulics from ongoing discharge and large waves of sediment moving through the system and estuary as legacy impacts attenuate over time. These need to be addressed as separate problems. High road density is listed as a source of fine sediment and elevated turbidity. Road surface conditions should also be included as a significant contributor to sediment discharge, especially fine sediment. Further, unstable areas associated with landslides from decades-old management activities are especially vulnerable where new logging roads traverse these features. Unstable areas are an ongoing source of fine sediment, as well. Among anticipated actions, consideration should be given to developing and maintaining a comprehensive inventory of unstable areas, to assist in proper ranch and logging road design and siting, and to avoid land use activities that may trigger mass wasting.	
6.1.11: EUREKA PLAIN HYDROLOGIC UNIT			
275	Mr. Harry Vaughn Eel River Salmon Restoration Program Miranda	Culver barriers replaced in Morrison Gulch (Jacoby Creek) have helped a lot. FRGP money was well-spent.	Comment noted.
6.1.12: EEL RIVER HYDROLOGIC UNIT			
276	Ms. Jene L. McCovey Native American Coalition for Headwaters Arcata	The Van Duzen River had successful redds after restoration only to be wiped out by sediment transport.	Comment noted.
6.1.13: CAPE MENDOCINO HYDROLOGIC UNIT			

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
277	Mr. Reid Bryson Mattole Salmon Group Petrolia	Southern subbasin summary text. Supports more coho salmon than other subbasins, but doesn't talk about subdivision, agriculture, and domestic water use as being bigger issues than grazing or timber. There are no cows in this subbasin.	The text in Section 6.1.13.3 was revised as follows: "Much of the subbasin is ~~largely~~ subdivided into small parcels of rural development or managed for timber production ~~and cattle ranching~~. Domestic and agricultural water consumption has contributed to reduced summer flows.
6.2.1: MENDOCINO COAST HYDROLOGIC UNIT			
278	Mr. Peter Ribar Campbell Timberland Management Fort Bragg	Several Mendocino Coast HSAs namely Usal Creek and Wages Creek (Rockport HA) and Russian Gulch HA/HAS are not discussed in Chapter 6 (6-49 through 6-62; but watershed prioritization was conducted 6.3) and chapters 8 and 9.	The document does not discuss all of the HSAs in detail. However, all of the HSAs within the range of coho salmon were considered during the watershed prioritization (maps 6-23 to 6-30) and recovery unit definition (map 6-14 and table 6-2). Therefore, these HSAs are part of the strategy and are covered in the recovery tasks. The general descriptions of watershed characteristics in Chapter 6 are arranged hierarchically. The watershed characteristics are discussed at the hydrological unit (HU) scale. Where characteristics of a Hydrologic Area (HA) or Hydrologic Subarea (HSA) were significantly different from the HU, or where a particular aspect of the HA or HSA needed to be called out, then that HA or HSA was discussed (within the context of the HU). The same holds true for the recommendations and tasks, that is, an HA or HSA is covered by recommendations and tasks at three different levels: First, the range-wide apply; second the HU apply; and third the HSA apply (rarely there are HA-level recommendations and tasks).
279	Mr. Harry Vaughn Eel River Salmon Restoration Program Miranda	Out-migrant monitoring at Sproul Creek- Road rocking by Barnum on the creek is resulting in lower turbidity (less than 20 ntus) compared to subdivided areas	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		(greater than 200 ntus).	
280	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	Gualala River HSA: The "HSA" encompasses only the South Fork of the Gualala River watershed. The Gualala "HA" encompasses all of the Gualala River watershed as well as coastal tributaries south to Russian Gulch.	The Gualala River HA includes the following HSAs: North Fork, Rockpile, Buckeye, Wheatfield, and Gualala. Recommendations and tasks are assigned at the HU and HSA level in this area.
281	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	Regarding the description, make the following changes: "This ~~HSA~~ HA consists of the Gualala River ~~and,~~ all its tributary streams and coastal streams south to Russian Gulch. The ~~Watershed~~ Gualala River watershed area is 190,992 acres (298 square miles) ~~222,399 acres (347 mi 2)~~. The main Gualala River tributaries include North Fork Gualala River, Little North Fork Gualala River, Rockpile Creek, South Fork Gualala River, Buckeye Creek, and Wheatfield Fork Gualala River~~, and Sproule Creek~~."	The Recovery Strategy has been amended to address the comment.
282	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	Sproule Creek is not a main tributary, but in fact is a small tributary of Marshall Creek, which is tributary to the South Fork Gualala. The NCWAP report has a very good watershed description, suitable for paraphrasing.	The Recovery Strategy has been amended to address the comment.
283	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	The TMDL analysis completed for this watershed (and for others where technical TMDLs have been established) should be acknowledged. The following text is proposed: On December 20, 2001, the USEPA established a sediment Total Maximum Daily Load (TMDL) for the Gualala River based on the information contained in the Gualala Technical Support Document (TSD) prepared by Regional Board staff and their consultants. The purpose of the TSD was to estimate current discharges of sediments to the surface waters of the Gualala River Watershed, and to identify the reduction in discharges necessary for achieving water quality standards contained in the North Coast Region Water Quality	The Recovery Strategy has been amended to address the comment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		Control Plan.	
		6.2.2 RUSSIAN RIVER HYDROLOGIC UNIT	
284	Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and Sonoma County Water Agency Walnut Creek	The Water Agency is not aware of any natural barriers that significantly impede migration in the mainstem of the Russian River. Both natural and man-made barriers are present in some of the tributaries. This Section should be edited to clarify the statement.	Comment noted.
285	Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and Sonoma County Water Agency Walnut Creek	The Recovery Strategy states that, "Factors specific to the mainstem that limit coho salmon production include barriers to upstream migration posed by permanent and seasonal dams…" Seasonal dams on the mainstem of the Russian River do not constitute barriers to upstream migration. All of the mainstem specific factors listed in this Section seem to apply primarily to tributaries of the Russian River. In the Russian River coho salmon spawn and rear in tributaries, not in the mainstem. The statement of "inadequate water quantity" for coho in the mainstem seems to be referring to another HSA and was probably never intended to reflect mainstem conditions. This Section should be edited to correct these inaccuracies.	The Department needs to investigate both points to determine whether it concurs. The Recovery Strategy has been amended to modify the last sentence of Section 6.2.2.1 to read as follows: "Factors specific to the mainstem that limit coho salmon production include barriers to upstream migration and other life history stages posed by permanent and seasonal dams, stream crossings and culverts, inadequate gravel quantity, insufficient riparian stability, ~~and~~ inadequate water quality, and seasonally unsuitable water quantity due to artificial breaching of the barrier beach for flood control purposes ."
286	Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and Sonoma County Water Agency Walnut Creek	The Recovery Strategy states that no coho salmon were found in Maacama Creek between 2000 and 2002. The Department collected juvenile coho from the Maacama Creek watershed (Redwood Creek) in 2001 for the coho salmon broodstock program. This Section should be edited to include this information. It would be helpful to include the presence/absence data as an appendix.	The Recovery Strategy has been amended to address the comment. The presence/absence data are too extensive for inclusion. However, the Department is preparing a manuscript regarding the presence/absence investigation. This publication strives to provide the most up-to-date data.
		6.2.3: BODEGA AND MARIN HYDROLOGIC UNITS	
287	Ms. Pamela J. Nicolai General Manager Marin Municipal Water District	Change the year referenced in the statement in section 6.2.3.2 (page 6-73, first paragraph): "Since 1985, releases from Soulajule Reservoir have maintained	The Recovery Strategy has been amended to address the comment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		perennial flow in Walker Creek," to "Since 1979" Change the statement in section 6.2.3.3 (page 6-74, third paragraph): "During recent surveys (2000-2002), coho salmon were found consistently in Lagunitas Creek, as well as in Devil's Gulch and San Geronimo Creek, but only one or two years in Olema Creek and two other smaller tributaries to Lagunitas Creek." This statement can actually read: "During recent surveys (~~2000-2002~~ 1997-2002), coho salmon were found consistently in Lagunitas Creek, as well as in Olema Creek, Devil's Gulch and San Geronimo Creek and its tributaries, but only one or two years in ~~Olema Creek and~~ two other smaller tributaries to Lagunitas Creek." MMWD's annual juvenile salmonid surveys since 1993 have found coho in Lagunitas Creek, San Geronimo Creek, and Devil's Gulch each year. MMWD's annual spawner surveys since 1995/'96 have also found coho each year. Annual surveys in Olema Creek and the San Geronimo tributaries did not begin until 1997.	
288	Mr. Don L. Neubacher Superintendent National Park Service Point Reyes	In addition to the mainstem Olema creek, a number of tributaries including John West Fork and Quarry Gulch, provide significant spawning and rearing habitat for coho salmon. Monitoring since 1997 has shown that Olema Creek supports 20-40% of the coho salmon within the Lagunitas HSA.	Comment noted.
		6.2.4 SAN FRANCISCO BAY HYDROLOGIC UNITS	
289	Ms. Betsy Wanner Bikle Mill Valley StreamKeepers	Based upon our recent work, we believe that the draft Strategy's use of Dr. Alice Rich's 1994 stream habitat survey of Arroyo Corte Madera del Presidio (see page 6-75) no longer represents the best current available information with which to characterize the stream.	Comment noted.
290	Ms. Betsy Wanner Bikle Mill Valley StreamKeepers	The Mill Valley StreamKeepers conducted a salmonid habitat survey during April, 2003, using California	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		Department of Fish and Game-trained surveyors, that indicates, contrary to Dr. Rich's 1995 report, that Arroyo Corte Madera del Presidio has a significant number of pools greater than three feet in depth, clean gravel at a large number of pool tail-outs suitable for coho spawning, and other habitat elements needed for supporting coho salmon's several freshwater life history stages. All of the coho salmon habitat elements…need some level of improvement.	
291	Ms. Betsy Wanner Bikle Mill Valley StreamKeepers	We attach the results of the stream temperature monitoring that we conducted between May and October of this year.	The Department appreciates the data.
		6.2.6: BIG BASIN HYDROLOGIC UNIT	
292	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	Page 6-86: Is Boulder Creek in Big Basin HU historic coho habitat? If only six miles of mainstem San Lorenzo River is habitat, how does Boulder Creek become habitat (being that it's much further upstream)?	Recent surveys by the Department have not detected coho salmon in Boulder Creek. However, parts of Boulder Creek are considered potential coho salmon habitat within the context of California coho salmon recovery.
293	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	6.2.6.2. The San Lorenzo is mapped as having a medium extinction risk (with coho extirpated per NOAA Fisheries), while the Davenport HSA is projected as high risk with coho present. This is confusing.	The extinction risk value consists of population and risk factors and is not scaled in a linear fashion. The high risk assigned to the Davenport HSA reflects the threat of potential development to coho salmon populations and habitat. See Appendix G: Watershed Prioritization for more explanation.
294	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	Prioritize within watersheds with respect to flow concerns and benefits to coho, especially San Lorenzo River.	Comment noted.
295	Mr. Chris Berry Water Resources Manager	Map of Big Basin HU (presumably Fig. 6-22, p. 6-83) does not show City's (presumably Santa Cruz) 4,000	The land ownership data on the maps are relatively coarse, but were the best statewide ownership data

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Water Department City of Santa Cruz	acres of watershed lands.	currently compiled. Given the time constraints, we were unable to collect additional ownership data from all cities involved.
296	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	Davenport HSA. In San Vicente Creek, both adult and young of the year coho salmon have been sighted for many years. Fish and Game biologists have surveyed and documented coho in the drainage.	Comment noted.
297	Mr. John Ricker County of Santa Cruz	p. 6-82: Reference to pumping of underflow and pumping of subterranean streams applies to only a limited number of streams in the Big Basin HU. There are no "subterranean streams" related to the streams identified as historically supporting coho, with the possible exception of San Vicente Creek, which does have some limestone in its watershed. Of more concern is the cumulative effect of pumping of larger groundwater basins that supply baseflow to the streams, particularly the San Lorenzo River and Soquel Creek, where significant draw down of groundwater levels has reduced the amount of groundwater discharging to the creeks and has contributed to baseflow reductions.	Comment noted.
298	Mr. John Ricker County of Santa Cruz	p. 6-82+: Cattle Grazing in San Lorenzo and Soquel-Aptos watersheds is limited to non-existent.	The following amendments were made to the Recovery Strategy to address this comment: Section 6.2.6.2. (p. 6-86), second paragraph: changed "cattle grazing" to "limited cattle grazing". Section 6.2.6.3. (p. 6-86), second paragraph: changed "cattle grazing" to "limited cattle grazing.
		6.3: WATERSHED PRIORITIZATION	
299	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	Pages 3.6.3, 6.2.6.2, 6-86, 7.1, and 7.2: There should be a prioritization within the watersheds, regarding flow concerns and benefit to coho. This would help identify critical stream reaches, existing refugia, and hopefully simplify untangling the web of water rights (particularly	Prioritization was done at the HSA level (Fig. 6-26). Some further prioritization within watersheds was done by assigning task levels to recommendations in the Implementation Schedule.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		the San Lorenzo). It should also be noted in this section that Scotts Valley, Felton and numerous riparian landowners and small rural unincorporated communities receive their water from the San Lorenzo River. Obviously this isn't a unique phenomenon, but should be more thoroughly detailed in the plan. Perhaps the Department of Health Services or County Env. Health could offer a more complete inventory of systems which might be drawing from any given basin. Finally on this issue, water rights review must be done with deference to seniority.	
300	Mr. Don L. Neubacher Superintendent National Park Service Point Reyes	Rather than just graphical representation, all of the prioritization rankings conducted in section 6.3.2 should also be summarized in a table.	The Department presented this information to the Recovery Teams in a variety of formats and the present format represented the most acceptable version (more details regarding these maps can be found in Appendix G).
301	Ms. Jene L. McCovey Native American Coalition for Headwaters Arcata	Identify the ten most productive streams of coho. Add to this list those streams that have 2 to 4 runs of other species. Do this for the SONCC. Identify what watersheds they are in and what are the cumulative effects of multiple land disturbances within each watershed. The Elk River is a prime example. How many different runs of fish are there in Elk River? The cumulative effect of over timber harvesting may not be in the preview of this "recovery" group, but it is the cause and will be the cause of the LOSS of the refugia. PL got the headwaters of Elk River during the negotiations for the Headwaters Forest Deal. PL went in and logged numerous times since the 1998 Headwaters Deal. During the 2000 winter rains, the bottom flats, alluvial fan raised the gravel bars 7 feet. It has worsened every year. PL has not complied with the laws.	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		CHAPTER 7: RANGE-WIDE RECOMMENDATIONS - GENERAL	
302	Mr. Chris Howard Simpson Resource Company Korbel	Chapter 7 did a good job capturing CRT recommendations.	Comment noted.
303	Mr. Craig Bell Occidental	The range-wide and watershed recommendations in the recovery strategy were voted on by the whole statewide team. There was no heavy-handed approach with mostly regulations. Everything was voted, everything was hammered out. Often line by line. Even though this process of working with everyone at the table was difficult, the Department still did it.	Comment noted.
304	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	The department has not kept a clean slate of those recommendations developed by the Recovery Team for either the Range-wide recommendations or for the Watershed specific recommendations. This is troublesome to many of us who have worked so hard to find a "new way" for the state of California to do business. Meaning find a way to cooperatively, voluntarily, and without regulation, implement recovery actions and develop sound scientific information for coho salmon. It seems the department has mixed in many new recommendations through out the recommendations that have not had approval by the Recovery Team.	In the Recovery Strategy, a total of 1 range-wide recommendation and 51 watershed recommendations were added by the Department. As stated in FGC § 2107, the "recovery team shall work collaboratively to aid the department in developing the recovery strategy…" It is incumbent on the Department to make sure that the recovery strategy is complete, so that the Commission may be able to make the necessary findings. Therefore, new recommendations were added to fill gaps in the CRT's recommendations, as identified by Department staff. All new recommendations created by the Department that were not previously presented to the CRT, are identified in italics in the Recovery Strategy. The greater number of added watershed recommendations were for watersheds that the CRT did not get to or were unable to complete within the time allotted. In order to ensure consistency with the other watershed recommendations, the new, Department-generated watershed recommendations used the exact language as the CRT recommendations on adjoining watersheds. The timber alternatives were developed from non-consensus recommendations from the CRT,

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			and Department additions.
305	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata Mr. Felice Pace Klamath Forest Alliance Klamath Glen	Range-wide recommendations use too many meaningless words, such as provide, urge, encourage, and explore. Recommendations are replete with voluntary measures - facilitate, investigate, review, offer, promote. There is an over-reliance on voluntary methods.	As Mr. Bell stated in comment #303, the recommendations were developed, often word by word, by the CRT. The Department's interpretation of language in the recommendations can be found in the Implementation Schedule. Because the CESA does not require any person to recover coho salmon, the Recovery Strategy emphasizes voluntary actions, incentives, and cooperative approaches.
306	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	Restoring watersheds and habitat to some idealized or mythical condition is not necessarily needed for recovery of the species.	Comment noted.
307	Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and Sonoma County Water Agency Walnut Creek	There seems to some confusion between recommendations given at the HU land HSA levels. While the CRT tried to identify recommendations that pertained to much of the HU at the HU level and repeat that recommendation at the HSA level where that action would be important to implement, it seems that we were not consistent in following through with this strategy. It may be better to clarify the recommendations at the HU level by adding a reference to the HSAs where it would be most beneficial to implement the recommendation.	Comment noted.
308	Ms. Margaret Boland Forest Supervisor Klamath National Forest	Recommended addition: The Forest Service will contribute to the recovery goals for coho salmon through implementation of the Aquatic Conservation Strategy as outlined in the Northwest Forest Plan, and specific Standards and Guidelines identified in the Land and Resource Management Plan for each [National] Forest [in the range of California coho salmon.	The Recovery Strategy has been amended to address the comment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
309	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	Proposed 17 revisions or additions to range-wide recommendations.	All recommendations and tasks were discussed, evaluated, and voted on by the CRT. The commenter can work with the Department and recovery teams in the ensuing years to evaluate the suggested revisions.
310	Ms. Pamela Nicolai Marin Municipal Water District	There are a few recommendations that are very broad, generalized statements that provide little direction but which could be interpreted with far reaching implications. We suggest these recommendations be revised to be more specific to their intended goals, or that they be deleted. The recommendations include: RW-I-D-01 (page 7-2); RW-XXII-A-06 (page 7-7); BM-HU-09 (page 8-52); and BM-LA-04 (page 8-55).	As Mr. Bell stated in comment #303, there commendations were developed, often word by word, by the CRT. These recommendations and the stated action (task) that needs to be considered are specific to the referenced watersheds. The Department's interpretation of the language in the recommendations can be found in the Implementation Schedule.
311	Mr. Ralph Modine Supervisor, 4th District Trinity County	The focus on water rights, water flow and water quality, while needed must not be based only on coho habitat. The on-going population growth, housing demands, agricultural use and other human factors cannot be ignored.	Comment noted.
312	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	There should be a section on Nutrients added to the range-wide recommendations. The Proceedings of the 2001 Nutrient Conference "Restoring Nutrients to Salmonid Ecosystems" held in Eugene Oregon in April 2001 has been published by the American Fisheries Society (Stockner, J.G., editor. 2003. Nutrients in salmonid ecosystems: sustaining production and biodiversity. American Fisheries Society, Symposium 34, Bethesda, Maryland.). This citation should be added to the Strategy and recommendations on nutrients should be developed by DFG for both Range-wide and Watershed recommendations.	There are several discussions and references in the Recovery Strategy regarding both the positive and negative aspects of nutrient input (see Chapters 2, 3, 5, and 6; Table 5.1; RW-V-B-01, page 7-4, RW-XXIX-B-03, page 7-16; SS-HA-07, page 9-58, MC-GA-07, page 9-100, MC-NA-03, page 102, BM-SA-01b, page 122, BM-WA—1, page 123). The CRT did not opt to develop a section dedicated to nutrients at a range-wide scale. The commenter can work with the Department and recovery teams in the ensuing years to both evaluate the cited reference and need for more actions and tasks regarding nutrients.
313	Mr. Richard Alves United Anglers of California San Jose	We recommend the Commission should take the following actions: - Identify and recommend to the Governor and the Legislature the purchasing of available water from	Comments noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		willing sellers in Oregon to provide water while the strategy is being implemented. - Recommend increased enforcement staffing for both the Department of Water Resources and the Department of Fish and Game with pay scales equal to the Highway Patrol. - Recommend the Legislature study the feasibility of reopening water adjudication for the Trinity River Diversion. - Recommend the Governor convene the California Congressional Delegation and ask for by-partisan support to obtain funding and leadership for successful implementation of the strategy.	
7.1: RANGE-WIDE RECOMMENDATIONS – STREAM FLOW			
314	Mr. Denver Nelson Eureka	Water restoration is much more efficient and less expensive than habitat restoration.	Comment noted.
315	Mr. Larry Moss Smith River Alliance Trinidad	Adequate water flow necessary for coho salmon recovery… is in the recovery strategy but needs to be highlighted and specified where/how water quantity and quality will be improved.	The Department recognizes the fundamental need for adequate water flows and has detailed range-wide recommendations under two major categories; streamflow and water rights (pages 9-4 to 9-6). Adequate water flows are also addressed on a watershed specific basis.
316	Mr. Robert B. Davis Montague	The operation of river flows can be greatly improved by putting an end to unreasonable demands by environmentalists that conflict with what is the best operation for the good of all concerned.	The State Water Resources Control Board is responsible for water appropriation and regulation for the state. The Department, as a Trustee Agency for fish and wildlife resources, can intervene by protesting new water rights applications, but once the final appropriation ruling has been made, the Department must follow the Water Resources Control Board rulings.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			Incentives for participation in programs associated with the Recovery Strategy, where necessary, would be based and negotiated by entities in possession of statutory water rights.
317	Mr. Dave Hillemeier Fisheries Program Manager Yurok Tribe	A notable difference between the two flow study recommendations is that the CRT recommends that the Tribes be included on the group of technical experts that will be charged with determining the flow study methodologies to be followed, while the public draft document fails to mention the Tribes as an "identified action entity" (entities identified include CDFG, NOAA Fisheries, USFWS, USFS, RCDs, CRMP, and SRWC).	Task Number WM-9 (page 10-11) recommends that instream flow studies be conducted on the Scott and Shasta rivers to determine flow-habitat relationships for coho salmon. A broad based technical advisory group would oversee this work. Although the Yurok Tribe was not specifically identified as an action entity, it is not the Department's intent to exclude the Tribe from this effort. A successful outcome from these studies will require the participation of all entities having a legitimate interest in the product.
319	Mr. Kallie Kull FishNet 4C	Time and again the Coho Recovery Team clearly stated that agriculture and forestry were preferred land uses for protecting salmon, over urbanization or industrialization. We suggest adding a qualifying statement in this section regarding the commitment of the Coho Recovery Plan to support these rural economies in areas threatened with urbanization. This would include working with and financially supporting farmers to provide alternatives when necessary to protect instream flows. This includes aiding farmers with State Water Board applications and funding for constructing off-channel storage and assistance to secure appropriative rights.	The Department acknowledges that working landscapes can help recover coho salmon. Page 5-10 states "Approximately 36% of all lands in coho salmon range are private agricultural and forested lands. Cooperative efforts to maintain and restore coho salmon habitat on private land are usually more effective in watersheds where there are large contiguous parcels of forest and agricultural lands, in comparison to watersheds with multiple small ownerships and a relatively high human population density. This is only one of the benefits of having productive resource and community-based landowners maintaining lands in a contiguous and open landscape."
320	Mr. Brian Woolsey Hydrologist/Geomorphologist Samoa	The range-wide streamflow recommendations are weak overall and do not address issues regarding hydrograph alterations from land use management activities. Recommendations should address coho issues (biological and habitat related) related to minimum and peak flows, flow timing, and flood frequency.	Recommendations, such as RW-I-D-02 and RW-XXXI-B-07, speak to mimicking the natural hydrograph.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
321	Ms. Pamela J. Nicolai General Manager Marin Municipal Water district	Recommendation RW-I-B-01 (page 7-1) should be revised to include the term "met" as follows (see underlined text addition): "Encourage the use of passive diversion devices designed to allow diversion of water only when minimum flow requirements are met or exceeded."	The Recovery Strategy has been amended to address the comment.
322	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	RW-I-B-01 states "Encourage the use of passive diversion devices designed to allow diversion of water only when minimum flow requirements are exceeded". DFG and SWRCB must establish minimum flow requirements for all coho streams in order to protect coho and make this recommendation meaningful. RW-I-D-08 states that DFG should "support a comprehensive stream flow evaluation program to determine instream flow needs for coho salmon in priority watersheds". DFG needs to do more than "support". They should "implement" such a program. DFG should do this for ALL coho stream but start with watersheds that have a 4 or 5 priority ranking. DFG should request that the SWRCB and/or counties place a moratorium on ground water pumping adjacent to coho streams. The moratorium shall remain in place until subterranean flows and effects upon surface flow in coho streams is quantified and minimum instream flows for coho are met. DFG should request that the SWRCB and/or counties place a moratorium on surface diversions on coho streams. The moratorium shall remain in place until the effects upon flow in coho streams are quantified and minimum instream flows for coho are met.	Comment noted.
323	Mr. John Ricker County of Santa Cruz	We support the recommendation for appropriate land use planning (RW-I-C-01). The State of California has	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		recently imposed housing goals on Santa Cruz County that will require substantial increase in stream diversion and/or groundwater pumping with potential for adverse impacts on streamflow.	
324	Ms. Pamela J. Nicolai General Manager Marin Municipal Water District	Recommendation RW-I-D-01 (page 7-2), related to water conservation, encourages elimination of unnecessary water uses, "through education components of this strategy." We found no part of the education component of the report to make any reference to conservation. Revise or delete this recommendation.	Section 5.3.1 has been revised amended as follows: "Priority will be given …, including recommendations that focus on water flow and conservation, water quality,"
325	Ms. Kallie Kull Program Director FishNet 4C	RW-I-D-02. While the FishNet program supports the need for adequate instream flows for salmon on the Central Coast, we also know how critical it is in our region to continue to support agriculture, in order to avoid urban development. There is a real threat that one-by-one our coastal farms will be shut down, through the 1600 permit process and CESA, with regards to riparian withdrawals, with no comprehensive plan for protecting agriculture and working with farmers. We need a regional comprehensive approach to this issue.	Comment noted.
326	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City Mr. Brian Woolsey Hydrologist/Geomorphologist Samoa Ms. Kallie Kull Program Director FishNet 4C	Section 7.1 Stream Flow (page 7-2 and 7-3): Recommendations RW-I-D-03 and RW--D-07 appear to be identical, just written differently.	The Recovery Strategy has been amended to rectify discrepancies between the Recommendations listed in Section 7.1 and the tasks in the Implementation Schedule. Please see Table 9-1 Implementation Schedule for Range-wide Recommendations task number RW-I-D-07 (page 9-5) for the task addressing water drafting for roads and fire suppression.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
CHAPTER 7.2: RANGE-WIDE RECOMMENDATIONS – WATER RIGHTS			
327	Mr. Felice Pace, Klamath Forest Alliance Klamath Glen	Dedicate funds to water purchase and water quantity, especially in the Scott-Shasta. Annually leasing water is not sustainable.	Leasing water is one of several methods recommended to provide instream flows required by coho salmon. Other recommended methods include purchase of water rights from willing sellers and developing incentives for water rights holders to dedicate instream flows. Water leasing can be sustained if implemented under an endowment program where interest only is used to finance water leasing.
328	Ms. Jene L. McCovey Native American Coalition for Headwaters Arcata	When weighing between allocating water between agriculture and the coho fishery, please keep in mind that hay or potatoes can be grown on other land and the seeds can be stored for future regeneration on command. The coho salmon do not have the luxury of discontinuance. The upper Klamath River water diversions concerning farm land should be purchased outright. The subsidies given in 2000-2001 to some farms was more than the money they would have earned if they were able to grow the crop. The subsidies were over and above the worth of the crop. This should never happen again. The same should apply to irrigators who do not conserve water. They should not be paid for water they do not conserve. A water marshal should go to the fields and compile water loss tallies and subtract them from any "incentive" prior to money allocations.	CESA does not require that any person recover coho salmon. Therefore, the recovery strategy does not weigh one interest over another. Rather, it acknowledges all potential threats and identifies ways to recover coho salmon in view of the potential threats. Among the many recovery actions identified in the recovery strategy is the acquisition of water rights from willing sellers. The recovery strategy identifies enforcement of water laws and administrative processes to review water rights to ensure they take into account the public trust. The recovery strategy also identifies incentives for conserving water or acquiring water rights from willing sellers for instream coho salmon benefits. In some circumstances, incentives or acquisitions may be more expeditious and effective tool to recover coho salmon.
329	Mr. Darin and Ms. Laura Claiborne Yreka	Why not consider fisheries and water storage for the Coho and more water storage in the way of reservoirs? Another idea for water is to create desalinization for the southern California water interests that are currently pulling water out of the north state.	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
330	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	Water rights review should be done with deference to seniority.	Comment noted.
331	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	In order for DFG to act upon recommendation RW-II-A-04 they must identify all streams where flow is a limiting factor. DFG needs to add language to identify all coho streams where flow is a limiting factor and not just in "priority watersheds".	Because of the time, personnel, and finances that will be required to recover coho salmon, such analysis is initially tied to watersheds prioritized by the CRT and Department. The Department believes that long-term leases have a role in the recovery of coho salmon.
332	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	DFG should not recommend "leasing" water rights (RW-II-B-01) but should support "purchase" of permanent water rights. Leasing water rights is not cost effective.	The Department believes that long-term leases have a role in the recovery of coho salmon.
333	Ms. Kallie Kull Program Director FishNet 4C	RW-II-A-05 "Ensure that water availability analysis on priority coho *streams…*	Recommendation RW-II-A-05 remains unchanged.
CHAPTER 7.3: RANGE-WIDE RECOMMENDATIONS – FISH PASSAGE			
334	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	Fish passage barriers should be defined as any man made structure that impedes the migration of coho salmon at any life history stage. This should include, but not be limited to, culverts, dams (including push-up dams, flashboard dams and summer dams), tide gates, fords, etc. Thermal barriers and inadequate flow should also be considered "fish passage barriers".	Comment noted.
335	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	DFG should identify dams that should be removed in order to fully protect and restore coho salmon.	The Department and other agencies and organizations are conducting such analyses.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
336	Ms. Chrissie Ishida Copco Lake	I live on a lake that has been threatened with dam removal, and more government land acquisition. I know that if our dams go, life up here will be devastated.	There is no proposal in the Recovery Strategy to remove the major Klamath River dams; however there is an interim plan to assess the feasibility of dam removal. Implementation of task number KR-HU-11 addresses Klamath dams: "Perform cost/benefit analysis of full or partial Hydroelectric Project removal for the purposes of im proving water quality, fish passage and sediment transport. " The only other section of the Recovery Strategy that discusses dam removal does so in a hypothetical sense from the standpoint of a rough estimate of economic costs of dam removal, in general (Appendix F).
337	Ms. Margaret Boland Forest Supervisor Klamath National Forest	Amend RW-III-C-01. From an ecological and economic standpoint, it is often desirable to include hydrologic and debris passing capacity above the road surface in addition to that of the pipe. Reducing the vertical profile of crossing fills reduces the volume of sediment that might be delivered during crossing failure and increases the potential for stream materials to pass downstream during flood flows: "Encourage funding authorities to allocate adequate resources to construct new crossings ~~prioritize~~ and upgrade existing ~~culverts~~ crossings (bridges, culvert and fills, other crossings) within the range of coho salmon to accommodate ~~pass~~ a 100-year ~~flows~~ flood and associated ~~debris loads (e.g., LWD that might be mobilized)~~ bedload and debris . Priority for upgrading should be based upon the potential impact to coho salmon habitat."	The Recovery Strategy has been amended to address the comment.
CHAPTER 7.4: RANGE-WIDE RECOMMENDATIONS – POLLUTANTS			
338	Mr. Brock Dolman Occidental	Did not note anything about waste water treatment.	Waste water is not specifically identified but is generally addressed under range-wide recommendations for Pollutants (page 9-8) and Enforcement of Existing Laws (pages 9-22 to 9-25).
339	Mr. Doug Smith	Reliance on TMDLs is too voluntary. The TMDL process	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Humboldt Watershed Council Arcata	ends in 2007, just when the TMDL for the Mad River is scheduled to begin.	
340	Ms. Jene L. McCovey Native American Coalition for Headwaters Arcata	The use of herbicides should be a factor to consider in recovery. Herbicides are known endocrine disrupters and can cause metamorphosis of fish gender, cause them to swim the wrong way and can cause deformations like having two heads. The use of back pack spraying of herbicides leaves residues of chemicals in the environment. Once in the soil they don't degrade as readily and can stick to the soil particles. The saturation of soils with herbicides creates a pathway to the stream by virtue of runoff. The use of petroleum products help the herbicides to spread and adhere to plants. These products are known to cause cancer and are considered very toxic to fish.	The commenter can work with the Department and recovery teams in the ensuing years to discuss this recommendation.
341	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	DFG should investigate the impacts to coho salmon from estrogen and other chemicals that are found in coho streams and have a negative effect on health and reproduction of coho. DFG should utilize the investigation results to develop recommendations more specific than “achieving Clean Water Act compliance”.	The commenter can work with the Department and recovery teams in the ensuing years to discuss this recommendation.
342	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	“RW-V-B-01 Improve water quality by reducing or minimizing point and non-point domestic, agricultural, and municipal sources of nutrient input (i.e. sewage treatment plant discharge, septic system discharge, and storm drain runoff). Support efforts by cities and rural communities to complete system upgrades to achieve Clean Water Act compliance.” Include agricultural sources in addition to domestic and municipal sources. Non-point sources of nutrients from pastures, barn feeding areas, and instream watering areas are entering adjacent streams with coho salmon populations.	This recommendation has been replaced with the following: “RW-V-B-01 Improve water quality by reducing or minimizing point and non-point sources of nutrient input (e.g., sewage treatment plant discharge, septic system discharge, storm drain runoff, and agricultural runoff). Support efforts by cities and rural communities to complete system upgrades to achieve Clean Water Act compliance.”

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		7.5: RANGE-WIDE RECOMMENDATIONS – SEDIMENTS	
343	Mr. Brian Woolsey Hydrologist/Geomorphologist Samoa	This section refers to the general identification and treatment of sediment sources; however, lacks the establishment of strong thresholds for sediments derived from specific land management uses such as, forest practices, road construction, agriculture, urbanization, aggregate mining, etc. This section should also enforce TMDL guidelines and targets for sediments in basins where TMDLs are established.	The recovery strategy recommends enforcement of existing laws. Section 7.20 (Enforcement) (specifically recommendation RW-XXXIII-A-01) has been amended as follows to specifically acknowledge that existing laws should be enforced to protect instream LWD: "Support enforcement of existing laws, codes, regulations, and ordinances that address the protection of coho salmon and their habitat. Habitat includes but is not limited to water (quality and quantity), pools, riffles, instream LWD, riparian vegetation, and estuaries…" This recommendation applies to the regional water quality control boards and enforcement of basin plans, which would incorporate TMDLs.
344	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	DFG should differentiate between road decommissioning and road "upgrades". DFG should place a higher priority on decommissioning. Any funding for "upgrades" should be secondary to decommissioning and only funded if they are not required by law, codes, statute, ordinance, etc.	Upgrading of roads has shown considerable positive effect on sedimentation in watercourses. The Department does not believe decommissioning is always necessary or achievable, and upgrading should not be made secondary universally. However, the commenter can work with the Department and recovery teams in the ensuing years to discuss this recommendation.
		7.6: RANGE-WIDE RECOMMENDATIONS – WATER TEMPERATURE	
345	Mr. Brian Woolsey Hydrologist/Geomorphologist Samoa	Recommendations should include the maintenance and restoration of riparian canopy and streamflow.	Recommendations addressing these issues are found in Section 7.1, 7.2, 7.6, 7.7, and 7.13.
346	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	DFG should change recommendation RW-X-B-01 by defining adequate temperatures for coho and changing "specific streams" to "all streams".	The Department does not have the ability to investigate temperature in all streams and believes strategic sampling can provide the necessary information nonetheless. The recommended change was discussed by the CRT and did not receive

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			consensus agreement.
7.7: RANGE-WIDE RECOMMENDATIONS – LARGE WOODY DEBRIS			
347	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	This section addresses LWD recruitment but does not address protection of existing LWD in streams and rivers. Large fallen and transported trees in mainstem rivers and estuaries are routinely cutup for firewood and commercial wood products without regard for their value to fish habitat. In other instances they are completely removed under the guise of flood control or bank stabilization. It makes sense to protect existing LWD in streams and rivers in addition to addressing recruitment. Plus it is more economical to keep existing in-channel LWD than using additional project funds to replace it. The range-wide recommendation would read as "Implement measures to protect existing in-channel LWD, protect existing recruitment potential through retention of mature trees in the riparian zone, establish adequate near stream buffer areas protected from vegetation removal, and increase the amount of in-channel LWD."	The following recommendation has been added to Section 7.7(Large Woody Debris) to acknowledge the importance of protecting instream LWD. "Encourage federal, state, and county agencies and private landowners to protect instream LWD to the greatest extent practicable without endangering public safety, life or property." In addition, Section 7.20 (Enforcement) (specifically recommendation RW-XXXIII-A-01) has been amended as follows to specifically acknowledge that existing laws should be enforced to protect instream LWD: "Support enforcement of existing laws, codes, regulations, and ordinances that address the protection of coho salmon and their habitat. Habitat includes but is not limited to water (quality and quantity), pools, riffles, instream LWD, riparian vegetation, and estuaries. These include…"
348	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	Appropriate federal, state, and county agencies shall fully utilize all existing laws including but not limited to Department stream bed alteration permitting, coastal zone ordinances, SLC regulations, county ordinances and any other legal means to prevent removal of LWD within the 100-year flood plain with the intent of protecting habitat for the benefit of coho salmon. No LWD should be removed unless it is allowed for health or safety purposes under existing law. Any legal removal of LWD should be fully mitigated.	The suggested recommendations were discussed by the CRT and received non-consensus votes. However, the Department believes that retention of instream LWD is essential to coho salmon recovery. Therefore, the following recommendation has been added to Section 7.7(Large Woody Debris) to acknowledge the importance of protecting instream LWD. "Encourage federal, state, and county agencies and private landowners to protect instream LWD to the greatest extent practicable without endangering public safety, life or property."
349	Mr. Thomas J. Weseloh	Illegal removal of LWD should be prosecuted to the full	Section 7.20 (Enforcement) (specifically

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Northcoast Manager California Trout McKinleyville	extent o f the law. Any resultant fines should be allocated to mitigate the loss of LWD and expedite coho salmon recovery. Fines should be set high enough to fully mitigate any damage to coho habitat and cover all coasts of enforcement and prosecution.	recommendation RW-XXXIII-A-01) has been amended as follows to specifically acknowledge that existing laws should be enforced to protect instream LWD: "Support enforcement of existing laws, codes, regulations, and ordinances that address the protection of coho salmon and their habitat. Habitat includes but is not limited to water (quality and quantity), pools, riffles, instream LWD, riparian vegetation, and estuaries. …" Recommendations RW-XXXIII-A-07 and RW-XXXIII-A-08 address the issue of fines and penalty schedules.
350	Ms. Kallie Kull Program Director FishNet 4C	RW-XII-B. The recommendations within the Large Woody Debris section 7.7 deal primarily with LWD recruitment and protection of riparian buffers. The Department should add a recommendation that emphasizes the importance of retention of woody debris that is already in the stream system, including the channel and adjacent banks. Qualifiers should be included such as "when such debris is not imminently threatening structures or causing a public liability."	The following recommendation has been added to Section 7.7 (Large Woody Debris) to acknowledge the importance of protecting instream LWD. "Encourage federal, state, and county agencies and private landowners to protect instream LWD to the greatest extent practicable without endangering public safety, life or property." In addition, Section 7.20 (Enforcement) (specifically recommendation RW-XXXIII-A-01) has been amended as follows to specifically acknowledge that existing laws should be enforced to protect instream LWD. "Support enforcement of existing laws, codes, regulations, and ordinances that address the protection of coho salmon and their habitat. Habitat includes but is not limited to water (quality and quantity), pools, riffles, instream LWD, riparian vegetation, and estuaries. …"
351	Mr. John Ricker County of Santa Cruz	Recommendation RW-XII-B-01a, effort should be added to address and resolve conflicts between flood management activities and maintenance of riparian vegetation and large woody debris.	The following was appended to RW-XII-B-01a in the Implementation Schedule: "Address and identify possible solutions to potential conflicts between flood management activities and

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			maintenance of riparian vegetation and large woody debris."
		7.8: RANGE-WIDE RECOMMENDATIONS – STREAM COMPLEXITY	
352	Mr. Brian Woolsey Hydrologist/Geomorphologist Samoa	Instream alteration/ restoration should be avoided. Stream complexity (habitat or morphology) will re-establish by reducing sediment inputs and restoring natural flow regimes.	Comment noted.
353	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	Beavers provide complexity to coho streams. Their dams provide excellent rearing habitat for coho salmon. Beavers are often incorrectly perceived as a "problem" in many watersheds by people that do not understand their value to coho. DFG should protect beavers and their dams in coho streams in order to provide stream complexity that creates rearing habitat for coho salmon. DFG should educate landowners regarding the positive benefits of beavers and their dams. DFG should recommend reintroduction of beavers to historic areas to promote stream complexity and provide habitat for coho salmon.	The Department is responsible for the management and conservation of beavers. The potential role of beavers was discussed by the CRT during the development of the Recovery Strategy, and recommendations were developed for some watersheds (see pages 9-94 and 95, 10-20 to 25, 10-50). The commenter can work with the Department and recovery teams to evaluate this recommendation.
354	Ms. Kallie Kull Program Director FishNet 4C	RW- XIII-C-01 Modify *channel* or *flood control* maintenance manuals…	The Recovery Strategy has been amended to address this comment. Recommendation RW- XIII-C-01 changed to: "Modify channel or flood control maintenance manuals for consistency with habitat requirements and protection for coho salmon."
		7.9: RANGE-WIDE RECOMMENDATIONS – ECOLOGICAL REFUGIA	
355	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	DFG should utilize the refugia list submitted to the SWRT in January 2003. Refugia and core populations have been identified.	Appendix D listed the preliminary core populations. Refugia refer to many aspects of coho salmon ecology (e.g., summer-rearing, winter-rearing, key spawning, corridors). Task RWXXIX-B-03 calls for the determination of biological refugia as an interim/continual task, and the list provided to the CRT in January 2003 is certainly a good starting point for

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			that task.
7.10: RANGE-WIDE RECOMMENDATIONS – HABITAT FRAGMENTATION			
356	Mr. Brian Woolsey Hydrologist/Geomorphologist Samoa	Habitat is often fragmented in stream systems that are aggraded and/ or have diminished low flows resulting in isolated pools and dry riffles. It may be necessary to limit water diversions and re-establish historical flows in streams that are experiencing habitat fragmentation due to low/diminished flows.	Comment noted.
357	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	"Habitat connectivity" and "habitat fragmentation" should include but not be limited to adequate stream flow and water temperature.	Comment noted.
7.11: RANGE-WIDE RECOMMENDATIONS – COMPETITION			
358	Mr. Doug Smith Humboldt Watershed Council Arcata	Invasive species are a problem.	Recommendations in Section 7.11 address this issue.
359	Ms. Margaret Boland Forest Supervisor Klamath National Forest	See RW-XVIII-A-01. Clarify/define "invasive non-native species". Does this include plants as well as aquatic organisms?	This recommendation addresses species that are not indigenous to the watershed and that adversely impact coho salmon or their habitat. This broad category may include plants as well as aquatic organisms.
7.12: RANGE-WIDE RECOMMENDATIONS – HATCHERY OPERATIONS, GENETICS, AND RELOCATION			
360	Mr. V.A. Littlefield Sound Salmon Policy Supporter	We need DNA testing for coho salmon in all areas so we can use hatcheries to their potential for recovery. The Sacramento River and hatchery enhancement should be used as a model of success. Mad River Hatchery is a necessary part of recovery.	The Department is collaborating with geneticists at NOAA Fisheries Southwest Fisheries Science Center to produce a coast-wide assessment of coho salmon population genetics. The Department and NOAA Fisheries intend to use this assessment to inform a multitude of recovery activities, including hatchery operations in support of recovery. Appendices H and I of the Recovery Strategy contain guidelines and policies for the scientifically justifiable use of genetic and other information to guide hatchery-based

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			recovery actions. Many of the guidelines and policies contained in these appendices are based on lessons learned in the Winter-run Chinook salmon captive broodstock and supplementation programs that have been ongoing in the Central Valley for over a decade.
361	Mr. V.A. Littlefield Sound Salmon Policy Supporter	Hatchery-produced coho salmon can recover the species.	In Appendices H and I of the recovery strategy we propose scientifically justifiable ways that hatcheries might be used to recover coho salmon.
362	Mr. Harry Vaughn Eel River Salmon Restoration Program Miranda	Small-scale rearing and hatcheries could be used to aid in recovery.	The Department believes that hatcheries can be a useful integrated tool to help recover coho salmon. The recovery hatchery policies and guidelines in Appendices H and I of the Recovery Strategy provide guidance on the appropriate and scientifically defensible use of hatcheries for recovery of coho salmon.
363	Ms. Lisa Rudnick Ben Lomand	Return to the practice of stocking coho salmon to streams where it is deemed appropriate.	Recovery hatchery policies are included in Appendices H and I. The policies and guidelines found in those appendices are intended to provide guidance on the appropriate and scientifically defensible use hatcheries for recovery of coho salmon.
364	Mr. Reid Bryson Mattole Salmon Group Petrolia	Chapter 7, section 12. Makes no reference to addressing potential benefits of rescue rearing in subbasin of Mattole River, which is dry 3 of 4 years.	Since rescue operations are considered a range wide issue, it is addressed at that level in the document and can be found in the implementation table in Chapter 9 under the Hatcheries, Genetics, and Relocations section. The Department will strive to evaluate specific watersheds on a case by case basis regarding the benefits of such a program. Further, issues specific to the Mattole River are also addressed in Chapter 9, in the “Mattole River HSA” section.
365	Ms. Kallie Kull Program Director FishNet 4C	RW-XX Hatchery Operations. We recommend that the Department add a recommendation that encourages the accelerated development of a plan with regards to the placement of progeny from broodstock raised and	Partially covered under “Release Protocols’ in Appendix I (Recommended Guidelines for Recovery Hatcheries), Table 1-2.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		spawned in coho conservation hatcheries. Also referred to as restocking, reintroduction, or recolonizing streams or tributaries. The urgent need for this type of evaluation is evident today in the CCCESU, where progeny from the Warm Springs Coho Conservation Hatchery on the Russian River are being considered for reintroduction into Walker Creek, a drainage into Tomales Bay. Reintroduction should be guided by genetic analysis and risk assessment, with great care taken to gather monitoring data to be used in adaptive management and future intervention activities. Landowners should be consulted and if necessary, Safe Harbor Agreements should be considered.	State law does not provide for safe harbor provisions under CESA
7.13: RANGE-WIDE RECOMMENDATIONS – RIPARIAN VEGETATION			
366	Mr. David Webb Mt. Shasta	On page 7-7 (RW-XXII-A-04) the document apparently calls for the blanket removal of alders in order to release conifers. Again, this is the product of very provincial thinking by people familiar only with coastal conditions, and while perhaps completely appropriate for coastal drainages where alder thrive, it makes absolutely no sense in the Shasta Valley where any tree providing stream shade should be treated like gold, and where soil and rainfall (< 20") conditions generally preclude the growth of nearly all conifers anyway.	The Recovery Strategy has been amended to take into consideration the inland areas of coho salmon habitat and the appropriate vegetation types therein.
367	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	Protection of large conifers should be a stated goal in recommendations RW-XXII-A-04, RW-XXII-A-05, RW-XXII-A-06 and RW-XXIII-E-01.	The commenter can work with the Department and recovery teams in the ensuing years to discuss this recommendation.
7.14: RANGE-WIDE RECOMMENDATIONS – ESTUARIES			
368	Mr. Sterling McWhorter Petrolia	Estuaries are in trouble; too hot and not enough cover. But things can be done there to improve the situation.	The Recovery Strategy discusses the importance of estuaries (page 2-29) and provides recommendations to address problems. See range-wide

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			recommendation RW-XXIII-E-01 (page 7-8) and watershed specific recommendations: KR-KG-01 and KR-KG-01(page 8-5); RC-HU-01 (page 8-27); TP-LR-01, TP-LR-02, and TP-LR-04 (page 8-29); EP-HU-03 (page 8-29), EP-HU-06d (page 8-30); ER-HU-12 (page 8-33); CM-HU-04 (page 8-36); RR-MS-01 and RR-MS-02 (page 8-49); BM-LA-08 (page 8-55); BM-BO-02 (page 8-56), BM-BO-05 (page 8-57); and BB-HU-07 (page 8-60).
369	Mr. Reid Bryson Mattole Salmon Group Petrolia	Need recommendations for restoration of estuary.	See RW-XXIII-E-01, pg. 7-8, RW-XXIX-F-01, pg. 7-16, and CM-HU-04, pg. 8-36.
370	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	Section 7.14 Estuaries (page 7-8): RW-XXIII-E-01 h. Minimizing artificial ~~breeching~~ *breaching* and associated potential negative impacts.	The Recovery Strategy has been amended to address the comment.
7.15: RANGE-WIDE RECOMMENDATIONS – LAND USE			
371	Mr. Doug Smith Humboldt Watershed Council Arcata	Land purchase does not help recovery.	Purchase of conservation easements or fee title from willing sellers is one of the many voluntary tools that can be used to aid coho salmon recovery.
372	Mr. V.A. Littlefield Sound Salmon Policy Supporter	Is the Department suggesting that human inhabitants be removed from the 1-mile buffer zone on each side of a river?	Nowhere in the Recovery Strategy is there reference to removal of human inhabitants or to a 1-mile buffer zone. Range-wide and watershed recommendations that address riparian buffer zones are presented in the context of a voluntary and incentive based Recovery Strategy that recognizes private property rights.
373	Ms. Sally French Land owner FLC Board Member Buckeye Conservancy Vettersburg	Need to help preserve ranches from subdivision. Large land owners are threatened with extinction.	The Department acknowledges that working landscapes can help recover coho salmon. Page 5-10 states: “Approximately 36% of all lands in coho salmon range are private agricultural and forested lands. Cooperative efforts to maintain and restore

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			coho salmon habitat on private land are usually more effective in watersheds where there are large contiguous parcels of forest and agricultural lands, in comparison to watersheds with multiple small ownerships and a relatively high human population density. This is only one of the benefits of having productive resource and community-based landowners maintaining lands in a contiguous and open landscape."
374	Mr. Brian Woolsey Hydrologist/Geomorphologist Samoa	This section is inconsistent with addressing all land use threats listed in Section 3. Additional measures to reduce threats posed by land uses include: limiting total impervious areas in urbanized coho basins, eliminate physical confinements of instream habitat (e.g., channelized stream reaches).	Chapter 7 includes all the consensus recommendations put forth by the CRT. Additional recommendations can be added, in consultation with the Department and CRT, to updates of the Recovery Strategy.
7.16: RANGE-WIDE RECOMMENDATIONS – PUBLIC OUTREACH			
375	Mr. Brock Dolman Occidental	Education is necessary and needs to be community-based. There needs to be a literacy campaign regarding the situation and it needs to start in the headwaters.	Section 5.3 details the education component of the Recovery Strategy.
7.17: RANGE-WIDE RECOMMENDATIONS – INTEGRATION WITH OTHER PLANS AND PROGRAMS			
376	Mr. Ralph Modine Supervisor, 4th District Trinity County	The recovery strategy should increase emphasis on the link between state recovery and federal recovery planning processes, including local and regional efforts.	As detailed throughout the Recovery Strategy, there is a direct link between the federal and state recovery planning processes, including staffing overlap.
377	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 7-9, Section 7.17: The CIP is not mentioned in this section about integration with other plans and programs.	The Klamath River Conservation Implementation Program (CIP) is currently being revised and has not been released for agency review. The Department intends to evaluate the revised CIP when it becomes available to determine its potential contribution to the recovery strategy.
378	Ms. Margaret Boland Forest Supervisor Klamath National Forest	See RW-XXX-B-02. Clarify the need for increased sediment loads from restoration activities (i.e., because short-term adverse effects?).	This recommendation was added to address the effect that short-term increased sediment loads (e.g., from a culvert replacement) would have on the TMDLs for a

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			watershed.
379	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	The recommendations for reducing risks of catastrophic fires are com pletely inadequate. How will "establishing fire regimes" (RW-XXX-D-04) promote Coho Recovery. A large catastrophic fire in a Coho watershed will have immediate and lasting negative impacts for recovery. Reducing fuel loading and forest densities should be a recommendation under the stream flow, sediments, water temperature, large woody debris, riparian vegetation and watershed planning topics of this section.	RW-XXX-D-04 is one part of addressing fire and fuels management. It also recommends fire regime that in fact work to decrease both the risk and impact of large, catastrophic fires. D-01 and D-03 address integrating fuel management and coho salmon recovery. Coho salmon occur in watersheds of various fire regimes, and fire is an essential ecological process for healthy watersheds. The Recovery Strategy strives for implementation in conjunction with the National Fire Plan, Northwest Forest Plan, and regional Fire Safe Councils (see page 7-10).
7.20: RANGE-WIDE RECOMMENDATIONS – ENFORCEMENT OF EXISTING LAWS			
380	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	DFG should state *how* they will enforce the recommendations in this section (particularly RW-XXXIII-A-01). DFG should include a recommendation that they will seek agreements with local District Attorneys, regional prosecutors and the Attorney General to fully enforce recommendations in the Strategy. This agreement should be in the form of a written and signed document.	There are multiple means to implement any given task. The Department and recovery teams did not have time to discuss, evaluate, or list such means. In addition, different agencies and organizations will have different means to implement tasks. There are recommendations that address working with district attorneys and the Attorney General's Office (e.g., see pages 7-14, 9-23). The Department intends to work with district attorneys and the Attorney General's Office in determining how best to implement the recommendations.
7.21 RANGE-WIDE RECOMMENDATIONS – IMPLEMENTATION			
381	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	DFG should set a timeline (1 year) for identifying staffing needs for DFG to implement the Strategy and cooperate with other state, federal and county agencies to do the same. Special emphasis should be applied to actions that should be carried out in the first 5 years.	Comment noted.
7.22: RANGE-WIDE RECOMMENDATIONS – INSTREAM GRAVEL MINING			

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
382	Ms. Linda Falasco Executive Director California Materials Association of CA Sacramento	*Range-Wide Recommendations* Chapter, we recommend changing "…permits for instream gravel mining should require" to "…permits for instream gravel ~~mining~~ *extraction* should ~~require~~ *consider.*"	The recommendation has been changed from ~~mining~~ to *extraction*; however, the word "require" remains.
383	Mr. Ben Riggan Orleans	Any new regulations must consider potential impacts of the new wave of recreational mining outfits now coming in to coho habitats. Wide buffers should be given to tributary mouths and other areas where coho have been documented.	Current suction dredge regulations are designed to eliminate the potential for impacts to coho salmon by restricting suction dredging activity to locations and times when these activities will not impact sensitive life stages of the species. The Recovery Strategy itself has no regulatory effect and it does not contemplate any changes to the current suction dredge regulations.
384	Mr. Brian Woolsey Hydrologist/Geomorphologist Samoa	This section does not address the condition of highly degraded streambeds due to high historical rates of extraction. In highly degraded streams that have experienced long-term high extraction volumes, such as the Mad River and the Russian River, it may be necessary to limit the extraction volume to less that the mean gravel recruitment rate to help re-establish channel bed elevations and coho habitat.	The instream mining recommendation (RW-XXXV-A-01b), when adequately implemented by the lead agency under SMARA and by the Department through the Stream Alteration Agreement process, considers the potential for continued degradation.
385	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	DFG should provide additional information in section 7.22 that includes areas DFG considers inappropriate for instream gravel mining. DFG should include recommendations for mining tailings that include but are not limited to removal of tailings thus providing opportunities for restoring natural stream functions.	The Department evaluates the appropriateness of instream gravel mining when proponents apply for permits. The commenter can work with the Department and recovery teams in the ensuing years to discuss these recommendations.
386	Ms. Linda Falasco Executive Director California Materials Association of CA Sacramento	We appreciate the acknowledgment 1) of the extensive network of new requirements, protocols, and monitoring that mitigate potential adverse impacts and 2) that there have been no known adverse impacts to the coho since these requirements were put into place. We appreciate the consideration for alternative extraction volumes and methods, which should allow flexibility and consideration	Comments noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		for case-by-case situations.	
7.23: RANGE-WIDE RECOMMENDATIONS – ASSESSMENT, MONITORING, AND RESEARCH			
387	Mr. Denver Nelson Eureka	Not enough money allocated to recovery monitoring.	Comment noted.
388	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 7-16, item RW-XXIX-G-01: Long-term monitoring should be integrated with both recovery plans and the CIP.	The Department agrees that it will be important to reduce the overall costs of long-term monitoring by integrating the monitoring activities of related planning efforts. The language of recovery recommendation RW-XXIX-G-01 was discussed, evaluated, and voted on by the CRT during the development of the Recovery Strategy. The commenter can work with the Department and the CRT in the ensuing years to evaluate the potential for integrating long term monitoring associated with the CIP when it becomes available.
389	Mr. David Webb Mt. Shasta	On page 7-16 suggestion RW-XXIX-G-01 refers to the development of criteria in the "California coastal assessment and monitoring program". A program with a name like that is unlikely to be appropriate to do a good job of assessing inland watersheds (such as the Shasta) which are few, distant and impossible to pigeon hole into coastal categories.	While the title of the monitoring program may seem inappropriate for the Scott and Shasta Valleys, this title was developed by the Department to differentiate the program for the Coastal-draining rivers from the Central Valley assessment and monitoring program.
7.24: RANGE-WIDE RECOMMENDATIONS –TIMBER MANAGEMENT ALTERNATIVE			
390	Mr. Dave Hillemeier Fisheries Program Manager Yurok Tribe	As the technical/scientific experts for the Fish and Game Commission, the California Department of Fish and Game should recommend in the final document which of the three alternatives is most likely to achieve the goal of recovering coho salmon.	In accordance with the request of the Commission, the Department presented a range of alternatives for timberland management. The Department is available to provide its expert, scientific input to the Commission on the subject.
391	Mr. Richard Gienger Sierra Club, Salmon and Steelhead Coalition Whitethorn	DFG should provide an introductory paragraph on what the Fish & Game Commission requested, and an explanation to why there are 3 alternatives, identification of the Department's preferred alternative, and which of	The issue of timberland management was the only subject area upon which the CRT was unable to provide the Department with consensus recommendations. Therefore, at the request of the

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville Ms. Vivian Helliwell Pacific Coast Federation of Fishermen's Associations Kneeland	the 2 methods of implementation the Department prefers. Need an introduction to explain context and needs to state Department-recommended alternative. .	Commission, the Department has presented a range of alternatives for timberland management. Section 7.24 of the Recovery Strategy explains this. The Commission has yet to make a decision on what should be included in the Recovery Strategy relative to timberland management. The Department is available to provide its expert, scientific input to the Commission on the subject.
392	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	In Alt-A item 13 the "available" underlined appears twice and should be deleted in both places	The term "available" was removed; however this is generally understood for all tasks, as stated in Section 9.1.
393	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	In ALT-B DFG should add recommendations that include (1) having reasonable and necessary documentation of riparian areas needing riparian planting disclosed on projects done under CEQA and (2) call for DFG to exert its authority regarding watercourse crossings to ensure adequate design, construction and ma maintenance for coho protection and recovery.	It is not clear how this would be implemented. Since this section applies only to timber management, "projects done under CEQA" presumably refers to timber harvesting plans (THPs). Excessive removal of vegetation in riparian areas is addressed under the existing FPRs (which include the Threatened and Impaired Watershed Rules), and thus Timber Management Alternatives A, B, and C. to varying degrees. Under the canopy retention guidelines riparian areas would ordinarily not need planting.
394	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	DFG should include recommendations for the attainment of reasonable limits on harvest rates	The Department is not making rate of harvest recommendations. Although harvest intensity is an indirect and partial correlate with potential effects, The Department does not believe it is the most effective approach. Rate of harvest limitations would not address legacy impacts or sediment from existing road systems.
395	Mr. Thomas J. Weseloh Northcoast Manager California Trout	DFG should include recommendations for the establishment of qualified third party dominated Coho Recovery Monitoring Team and process for the team.	The program to assess and monitor coho salmon recovery, as described in Chapter 5, is envisioned to include all parties. Scientists knowledgeable and

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	McKinleyville		experienced in monitoring from across the western states will participate in the development of the program. Actual implementation and monitoring will be done by numerous individuals and organizations.
396	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	DFG should cite the Threatened and Impaired Rules (T&I) in order to provide clarity to Alt-B and Alt-C.	The Recovery Strategy has been amended to address the comment.
397	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	If a matrix comparing the various Timber Management Alternatives is added to the Strategy it should include the PL HCP, recommendations of the Science Review Panel and FEMAT.	A matrix comparing the various Timber Management Alternatives was not added to the Recovery Strategy.
398	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	DFG was directed to provide multiple alternatives for Timber Management but DFG should identify a single recommendation of their own under the "Timber Management Alternatives" and also a recommendation for how to implement the regulations that are most appropriate for coho protection and recovery. DFG should recommend ALT-A.	The issue of timberland management was the only subject area upon which the CRT was unable to provide the Department with consensus recommendations. Therefore, at the request of the Commission, the Department has presented a range of alternatives for timberland management. Section 7.24 of the Recovery Strategy explains this. The Commission has yet to make a decision on what should be included in the Recovery Strategy relative to timberland management. The Department is available to provide its expert, scientific input to the Commission on the subject.
399	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	The references to "petitioners" (under ALT-A) and "landowners" in ALT-B and ALT-C should be deleted. These are DFG recommendations and should be stated as such. ALT-C should be deleted as it is wholly inadequate to protect and restore coho salmon.	The issue of timberland management was the only subject area upon which the CRT was unable to provide the Department with consensus recommendations. Therefore, at the request of the Commission, the Department has presented a range of alternatives for timberland management. Section 7.24 of the Recovery Strategy explains this. The references to landowners and petitioners are provided to the Commission for their information so that they can understand how the alternatives were developed.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			Comment noted.
400	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville Mr. Richard Gienger Sierra Club Salmon and Steelhead Coalition Whitethorn	DFG should include recommendations for (1) the attainment of reasonable limits on harvest rates, (2) the establishment of qualified third party dominated Coho Recovery Monitoring Team and process for the Team and (3) a requirement that Registered Professional Foresters document potential adverse impacts to coho on completed operations prior to Completion Inspections by CDF and other agencies. These recommendations should be incorporated into all three Alternatives.	With regard to (1), the Department is not making rate of harvest recommendations. Although harvest intensity is an indirect and partial correlate with potential effects, the Department does not believe it is the most effective approach. Rate of harvest limitations would not address legacy impacts or sediment from existing road systems. With regard to (2), the program to assess and monitor coho salmon recovery, as described in Chapter 5, is envisioned to include all parties. Scientists knowledgeable and experienced in monitoring from across the western states will participate in the development of the program. Actual implementation and monitoring will be done by numerous individuals and organizations. With regard to (3), the commenter appears to be referring to Sierra Club recommendation XXYY-8, which recommends that a project completion procedure be established by CDF (in conjunction with other applicable agencies such as the Department) for THPs to evaluate the impacts of timber operations on coho salmon after the completion of operations, but prior to the official completion inspection by CDF and other agencies. This would allow completion inspection agencies to 'triage' inspections and directly inspect any pertinent areas, rather than choosing areas to inspect randomly or based on ease of access. The recovery strategy has been amended as follows to include a recommendation in Alternative B (Section 20) to address this comment. Alternative B, Section 20: <u>Recommend that CDF and the Board of Forestry work</u>

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			with DFG and other interested agencies and stakeholders to establish a procedure for THPs to document and evaluate the implementation and effectiveness of coho-related mitigation measures prior to the official completion inspection by CDF and other agencies.
401	Mr. William E. Snyder Deputy Director Resource Management California Department of Forestry Sacramento Ms. Danielle Lindler Executive Director Klamath Alliance for Resources and Environment	Supports timber alternative C as outlined in Chapter 7 (section 7-24),	Comment noted.
402	Mr. Richard Gienger Sierra Club Salmon and Steelhead Coalition Whitethorn	Need to explain why certain aspects not included in the forestry alternatives. For example, 5 of the 9 Sierra Club recommendations found their way, in an altered form, into the land owner alternative.	The Department understood from presentations by members of the CRT's timber working group as well as the facilitator that the Sierra Club recommendations were essentially incorporated in recommendations presented to the CRT by Petitioner members and Forest Landowner members. In the November 2003 Recovery Strategy, Alternative A represents the Petitioner members' recommendation and items 1 through 10 of Alternatives B and C represent the Forest Landowner members' recommendation. The Department now understands that five of the nine Sierra Club recommendations were included in the forest landowner proposal, but that Sierra Club recommendations XXYY-3, 7, 8, and 9 were not included. Sierra Club recommendation XXYY-7 calls for the establishment of a Coho Salmon Recovery Monitoring Team, composed of qualified stakeholder

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			representatives and experts, with a majority being 'third party' scientists having appropriate expertise. The program to assess and monitor coho salmon recovery, as described in Chapter 5, is envisioned to include all parties. Scientists knowledgeable and experienced in monitoring from across the western states will participate in the development of the program. Actual implementation and monitoring will be done by numerous individuals and organizations. The Department believes that Sierra Club recommendation 9 is essentially covered by Section 7.17 (Integration with Other Plans and Programs) and Section 7.19 (Watershed Planning). The recovery strategy has been amended, as follows, to include a recommendation in Alternative B (Section 19) to address a significant portion of Sierra Club recommendation XXYY-3 Alternative B, Section 19: "Recommend that a "proof of concept" pilot program be developed and implemented to test a mathematical or scientific method of cumulative effects analysis as was suggested in the 2001 report, "A Scientific Basis for the Prediction of Cumulative Watershed Effects" (otherwise known as the "Dunne Report", by the U.C. Committee on Cumulative Watershed Effects. The pilot program would be developed and implemented by a panel of experts such as those at U.C. in cooperation with the Department, CDF, and SWRCB." The recovery strategy has been amended, as follows, to include a recommendation in Alternative B (Section

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			20) to address Sierra Club recommendation XXYY-8. Alternative B, Section 20: Recommend that CDF and the Board of Forestry work with DFG and other interested agencies and stakeholders to establish a procedure for THPs to document and evaluate the implementation and effectiveness of coho-related mitigation measures prior to the official completion inspection by CDF and other agencies."
403	Mr. Richard Gienger Sierra Club Salmon and Steelhead Coalition Whitethorn	The final timber alternative choice should include the need for land owners to develop road management plans.	Roads have been addressed in Section 7.5 and to varying degrees by the timber alternatives. Alternatives B and C (item 5(a)) encourage landowners to develop and implement road management plans. The Commission has yet to determine what should be included in the Recovery Strategy relative to timberland management.
404	Mr. Richard Gienger Sierra Club Salmon and Steelhead Coalition Whitethorn	Believes an effective timber management approach would be a cumulative impact analysis on the Planning Watershed scale and a spelled-out implementation schedule.	Alternatives B and C (item 3) call for development and implementation of a program to design and implement a coho recovery plan for individual CALWATER Planning Watersheds. In addition, Alternative B has been amended to address the issue of cumulative impacts. Specifically, Alternative B, Section 19, has been added as follows: "Recommend that a "proof of concept" pilot program be developed and implemented to test a mathematical or scientific method of cumulative effects analysis as was suggested in the 2001 report, "A Scientific Basis for the Prediction of Cumulative Watershed Effects" (otherwise known as the "Dunne Report", by the U.C. Committee on Cumulative Watershed Effects. The pilot program would be developed and implemented by a panel of experts such as those at U.C. in cooperation with the Department, CDF, and

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			SWRCB.”
405	Mr. Richard Gienger Sierra Club Salmon and Steelhead Coalition Whitethorn	Need to include a coho salmon recovery monitoring team (one of the Sierra Club timber recommendations). Objective, qualified experts, that know what is necessary for coho salmon recovery, can make sure the strategy is being implemented effectively.	Sierra Club recommendation XXYY-7 calls for the establishment of a Coho Salmon Recovery Monitoring Team, composed of qualified stakeholder representatives and experts, with a majority being ‘third party’ scientists having appropriate expertise. The program to assess and monitor coho salmon recovery, as described in Chapter 5, is envisioned to include all parties. Scientists knowledgeable and experienced in monitoring from across the western states will participate in the development of the program. Actual implementation and monitoring will be done by numerous individuals and organizations.
406	Mr. Richard Gienger Whitethorn	Fish & Game's recommendation to the Commission should include those measures presented in August of 2002. Other measures which should be part of DF&G's preferred recommendations should be those that are in common between the 'Landowners' Alt-B', items 1-10, and the Sierra Club 'Timber Recommendations' -- with the caveat that the modest regulatory aspects of the Sierra Club Recommendations, which were overwhelmingly supported by the Coho Recovery Team, be included -- e.g. Road Management Plans and Planning Watershed Scale Recovery have valid and necessary regulatory needs, if only for standardization of process. Items 11-16 in Alt-B, and items 11-16 in Alt-C have merit for inclusion in the DF&G's preferred recommendations. Two in particular are the conservation easement/fee title process for Coho habitat protection, and extension of the T&I Rules for Coho protection and recovery.	Comments noted. See all responses to the commenter above.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		Four additional approaches/measures need to be included in DFG's preferred recommendations: (1) Cumulative Watershed Effects process and action reform – included establishment of reasonable and appropriate cutting rates; (2) MONITORING OF RECOVERY MEASURES Oversight of, and Direction for, the Various Monitoring Programs shall be by a RECOVERY MONITORING TEAM. This team shall have qualified representatives from various stakeholders, but the majority will be 'third party' qualified scientists with the appropriate expertise. DF&G shall be represented on the team, and shall be considered the lead agency amongst other agencies represented on the Recovery Monitoring Team. The Monitoring Team shall make recommendations for monitoring issues and measures necessary for Coho Recovery to the F&G Commission and Department, and to other appropriate entities.; (3) And toward effective THP monitoring: Monitoring of THPs and Other Projects that Require an RPF: Develop and implement a project completion procedure whereby the plan RPF documents post completion conditions for the plan, focusing on prescribed mitigations and other impacts, such as watercourse crossings, that may adversely impact Coho salmon.; and, (4) Integration of related processes, such as TMDLs.	
407	Mr. Harry Vaughn Eel River Salmon Restoration Program Miranda	Need cost relief for NTMP development to avoid cutting more timber to pay for the cost of plan development.	CDF's Stewardship Committee and the Buckeye Conservancy in Humboldt County have both been working on small landowner relief, including reducing costs for the preparation of NTMPs. Some of this relief may require multiple levels of development, including administrative changes, Forest Practice Rule changes, and legislation. The Department intends to continue to work with both the Forest Stewardship Committee and the Buckeye Conservancy to identify both short-term and long-term changes to reduce

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			costs and increase efficiency in the NTMP process.
408	Mr. Larry Moss Smith River Alliance Trinidad	Supports forestry alternative A.	Comment noted.
409	Mr. Larry Moss Smith River Alliance Trinidad	Forestry alternative C should be dropped. It will not contribute to recovery and the standards for habitat retention are inadequate.	Comment noted.
410	Mr. Larry Moss Smith River Alliance Trinidad	FPR T/I rules (July 2000) need better reference or include them verbatim as they could change over time.	The Recovery Strategy has been amended to address this comment.
411	Mr. Doug Smith Humboldt Watershed Council Arcata	The forestry alternative C is too voluntary.	Comment noted.
412	Mr. Felice Pace Klamath Forest Alliance Klamath Glen Mr. Doug Smith Humboldt Watershed Council Arcata	Unstable slopes are not protected enough. FPRs still allow for clear-cuts and harvesting on unstable slopes.	Because the timber management alternatives are based upon the current FPRs (which include the Threatened and Impaired Watershed Rules, 2004), all the alternatives address landslide risk to varying degrees. However, Alternative C does not provide for protection on Class IIs against landslides on inner gorges or headwall swales. Alternative A provides additional protection on Class II inner gorges, but no additional protection for headwall swales. Alternative B provides additional protection for Class II inner gorges and for headwall swales. There are additional broad prescriptive measures which could further act to avoid or minimize landslide risk. However, the Department anticipates that measures included within Alternatives A or B, in combination with the application of professional standards of practice for Registered Geologists will contribute to coho salmon recovery. Timber Management Alternatives B and C further identify proposals for monitoring and watershed

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			assessment which, if implemented, will provide data to assess effectiveness.
413	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	For the forestry alternatives, reference to land owners and petitioners should be stricken. The alternatives are the Department's now.	The Department, at the request of the Commission, has presented a range of alternatives for timberland management. The references to landowners and petitioners are provided to the Commission for their information so that they can understand how the alternatives were developed.
414	Mr. Felice Pace Klamath Forest Alliance Klamath Glen	The Public Review Draft does not use SAC guidelines for federal lands or the NOAA Fisheries input to the BOF for setting riparian protection measures in any of the forestry alternatives.	Comment noted.
415	Mr. Felice Pace Klamath Forest Alliance Klamath Glen	The Recovery Strategy calls for funding road upgrades, which is transferring income to timber companies. And they will choose upgrades or decommissioning. Public funds should only be used for road decommissioning, like with the Yuroks.	Road decommissioning is one effective way to prevent delivery of sediment to watercourses. However roads in active use are also significant sediment sources and upgrading to reduce sediment delivery and manage storm water runoff is a benefit to coho salmon recovery. Consistent with legally required restrictions on the application of restoration funding, the Department strives to fund both types of activities.
416	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	Why is forest management singled out in the range-wide recommendations?	The issue of timberland management is a subject area that the CRT discussed under the rubric of range-wide recommendations.
417	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	The timber management options are confusing and the terms used are not defined.	The baseline for the timber alternatives is the current FPRs (which include the Threatened and Impaired Watershed Rules). The terms used in the timber management alternatives are those defined in the current FPRs. Where the FPRs do not use such terms, the Recovery Strategy has been amended to define those terms.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
418	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	Timber recommendations are too detailed and would circumvent the existing process for regulating forest management under the Forest Practice Rules.	Comment noted.
419	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	It is not clear which timber management alternatives would be used or how the alternatives would be selected. Alternative A appears to address deficiencies in the forest practice rules, while the other alternatives primarily address the financial support required for needed watershed improvements. We believe both aspects are needed in timber management alternatives.	At the request of the Commission, the Department has presented a range of alternatives for timberland management. We expect the Commission to provide direction to the Department as to what to include in the Recovery Strategy.
422	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	All of the alternatives in Section 7.24 miss critical issues regarding logging roads and their impacts on salmonids. - The prevention of stream diversions is not addressed. We suggest that permanent, self-maintaining “critical” dips be constructed at all stream crossings where the potential for stream diversions exist. Diversion prevention should not rely on waterbars. Current forest practice rules regarding stream diversions are still weak, because they allow the continued use of waterbars to prevent diversions. - Road density and continued road construction are not addressed. There are currently more logging roads on the landscape than are physically and economically possible to maintain. Alternate A should limit new road construction to temporary roads, unless other existing roads within the sub-watershed are permanently decommissioned. Incentives should be provided to encourage road reduction through road decommissioning.	Impacts of roads are addressed in Section 7.5. See for example, RW-VI-D-01. In addition, the alternatives address roads to varying degrees.
423	Mr. Felice Pace Klamath Forest Alliance	The provisions for forestry and native-surface roads are not adequate.	The Department concurs that inadequate maintenance of logging and natural surface roads is a major factor

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Klamath Glen		in the decline of watersheds and coho salmon. Impacts of roads are addressed in Section 7.5. See for example, RW-VI-D-01. In addition, the alternatives which assume the existence of the current FPRs (including the Threatened and Impaired Watershed Rules) address roads to varying degrees. Timber Management Alternatives A and B each include recommendations (in addition to the current FPRs) pertaining to roads. These recommendations should be viewed in the context of existing law, under which the Department addresses roads during review of timber harvesting plans and development of streambed alteration agreements.
422	Mr. Ben Riggan Orleans	Ensure up slope protection for the cold water tributaries on which coho depend. Water is only as good as the watershed from which it comes. Many of these Key tributaries are threatened from logging or fire from overloaded fuels conditions or both. Fire is an essential part of ecosystem functioning however currently it is many of these watersheds biggest threat.	The threat of large, severe fires is addressed across the range of coho salmon. See range-wide recommendations RW-XXX-D-01, RW-XXX-D-03, RW-XXX-D-04, RW-XXX-D-05, RW-XXX-D-06, and RW-XXX-D-07 (page 9-18). Threat of fire is also addressed under watersheds deemed to be at risk. See watershed specific recommendations: KR-OR-05 (page 8-9); KR-UK-06 (page 8-10); KR-HC-06 (page 8-12); KR-SV-06 (page 8-14); KR-BC-01 and KR-BC-02 (page 8-15); SA-HA-05 and SA-HA-06 (page 8-19); SS-HA-01 (page 8-20); and TR-HY-02 (page 8-24).
423	Mr. Ben Riggan Orleans	Thinning and prescribed burning can help reduce excess fuel loads, make the forest more fire resistant, increase desired nutrients that help support the aquatic food chain, and may even increase summer base flows by increasing percolation to the water table. This is an essential but often overlooked part of fish recovery.	The Recovery Strategy acknowledges the importance of reducing fuel loads as a means of preventing catastrophic fires that could adversely affect habitat for coho salmon. The establishment of fire regimes that promote watershed function and health while reducing the risk and impact of extensive, high severity wildfires is included as a range-wide recovery recommendation.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
424	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	Page 7.24. Timber Management Alternatives. Alternative A is the most protective for streams of the alternatives presented. However, there are some oversights. While proposed Alternative A recognizes the necessity for a closer look at inner gorge roads, any such proposal to construct or reconstruct should be held to the highest standards of the Uniform Building Code or California Building Code, regarding Geotechnical and/or Geologic Reports, engineering, construction inspections/ observation etc.	Standards of practice for geotechnical reports are established by the California Geological Survey. The Department has neither the authority nor the expertise to second guess those standards.
425	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	A leave stand within the WLPZ should maintain or improve the necessary habitat elements within the WLPZ. The prescriptions identified are a good start with the exception of the 25% conifer retention component. The conversion of conifer dominated stream corridors to alder woodlands is evident throughout California. Increasing the conifer component along watercourses is a recurrent theme for restoration. The retention of only 25% of conifer in a conifer dominated system will further retard the recovery of coho. Desired future stand conditions should be established for WLPZ stands adjacent to coho streams. This could be done for HU's or HSA's.	The commenter's conclusion misunderstands how this will be applied. The overstory retention standard is variously 65% to 85%. In conifer dominated riparian areas it will be impossible to reduce conifer overstory to 25% and still meet the 65% or 85% standard. The residual conifer overstory will be much more than 25%. The 25% conifer retention standard will be a factor only in hardwood dominated or open canopy riparian areas. In these areas the 25% limitation acts to constrain or prohibit harvesting of the few conifers which are present. The practical effect is the result the commenter recommends.
426	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	Alternatives B and C seek to offset costs for landowners, and use scarce State resources to monitor the obvious (#7). Given the amount of privately owned timber land, there is some benefit to paying for efforts which exceed the Forest Practice Rule requirements to preserve and restore coho (#8). Where the money to support such measures comes from is critical. The State's economic climate, and agency commitments, staffing etc. makes it difficult to just shift money without decreasing the States ability to protect coho. The Timber Yield Tax should be explored for funding. A tiered yield tax could provide incentive for implementing recovery.	The Department agrees there is a general relationship between land disturbing activities and the likelihood of mass soil movement. The risk of soil instability varies by geology, soil type, climate, time of year, yarding methods, silviculture, construction methods and many other factors. The Department believes the recommendations must be well informed and that the State bears some responsibility for collecting and analyzing data to do so.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
427	Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County Yreka Ms. Danielle Lindler Executive Director Klamath Alliance for Resources and Environment	I have received input from constituents that the many forestry recommendations are excessive. The Forest Practices Act already has the most stringent restrictions in the country for the protection of anadromous fish and water quality. California already has the most stringent environmental regulations in regards to forestry activities in the country and some say even the world.	Comment noted.
428	Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County Yreka	All of these areas have been identified in the January 4, 2001 federal register notice as 'Urban Wildland Interface Communities Within the Vicinity of Federal Lands That Are At High Risk From Wildfire. Happy Camp, Seiad, Klamath River, Salmon River, Lower Scott and French Creek all have functioning fire safe councils. Until fuels are reduced throughout the forest through brushing and thinning, it would be completely irresponsible and dangerous to human life and property to recommend the reintroduction of fire.	Comment noted.
429	Ms. Patti Keating Chief Deputy Director California Conservation Corps Sacramento	Page 7-15 at 7.21 Implementation line RW- XXXIV-A-02 Support continued and increased funding for the California Conservation Corps to implement coho salmon restoration projects **throughout the entire coho range**. (Add **bold** section.)	The Recovery Strategy has been amended to address the comment.
430	Mr. Glen H. Spain Northwest Regional Director PCFFA and IFR	The forestry options for the coho recovery plan are lacking in several areas, in particular addressing and controlling cumulative impacts, and failure to limit the percentage of a watershed that can be cut over a particular time frame.	With regard to cumulative impacts, Alternatives B and C (item 3) calls for development and implementation of a program to design and implement a coho recovery plan for individual CALWATER Planning Watersheds. In addition, Alternative B has been amended to address the issue of cumulative impacts. Specifically, Alternative B, Section 19, has been added as follows:

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			"Recommend that a "proof of concept" pilot program be developed and implemented to test a mathematical or scientific method of cumulative effects analysis as was suggested in the 2001 report, "A Scientific Basis for the Prediction of Cumulative Watershed Effects" (otherwise known as the "Dunne Report", by the U.C. Committee on Cumulative Watershed Effects. The pilot program would be developed and implemented by a panel of experts such as those at U.C. in cooperation with the Department, CDF, and SWRCB." As to limitations on the percentage of a watershed that can be cut over a particular time frame are best addressed by the Forest Practice Rules through the Board of Forestry and Fire Protection's rule making process. DFG is not making rate of harvest recommendations. Although harvest intensity is an indirect and partial correlate with potential effects, DFG does not believe it is the most effective approach. Rate of harvest limitations would not address legacy impacts or sediment from existing road systems.
431	Mr. Glen H. Spain Northwest Regional Director PCFFA and IFR	We do not believe that the [Petitioners' Interim Resolution] measures are adequate to recover coho	Comment noted.
432	Mr. Glen H. Spain Northwest Regional Director PCFFA and IFR	The Department should carefully review the proposed forestry measures and adopt those biologically needed for coho recovery. Because of the intensely political nature of the process, many of those measures are not now among the measures recommended in the Draft, simply because they did not pass the individual veto process purely for political reasons.	Comment noted. The Department has reviewed and amended the timberland management alternatives.
433	Mr. Glen H. Spain	Independent scientific review of California's Forest	Comment noted

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Northwest Regional Director PCFFA and IFR	Practice Rules and the salmonid habitat protections in those rules has concluded that the current forestry rules are seriously deficient in a number of very important ways.	
434	Mr. Glen H. Spain Northwest Regional Director PCFFA and IFR	Alternative C should be scrapped from the options as inadequate by itself to recover coho. The Sierra Club's Nine Points should be added in Options A and B. Incidental take permits should not be given based on the measures in any of the three options.	See responses above to comments of Richard Gienger.
435	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	In addition, it (landowner alternative) needs to have a cost attached to it. It will be a lesser cost to the state, and it will cost those landowners who voluntarily participate in recovery actions. That contribution needs to be recognized by the state and all stakeholders, not only those who bear the cost.	The economic analysis has been revised based on available information; there are few incremental costs associated with Alternative C.
436	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	If all regulatory items are not removed from the draft strategy, (which would include the Timber Alternatives, except for the stand alone Forest Landowners proposal, because it is truly non-regulatory), the Commission must make the decision on which alternative to choose without any recommendation from the department.	Comment noted.
437	Ms. Noelle Cremers Director, Industry Affairs California Cattlemen's Association	As the Recovery Strategy is currently written, the Commission can only choose a regulatory or quasiregulatory approach to addressing timber issues. It is for this reason that CCA would strongly urge the Department not to provide a recommendation to the California Fish and Game Commission on the Recovery Strategy.	The Department does not believe that all of the alternatives are regulatory or quasi-regulatory. In addition, Alternative C Section 17 has been amended to clarify that there may be many solutions to ensuring the long-term survival of coho salmon. They may be regulatory and non-regulatory. It was not the Department's intent to conclude at this time that the solution must be a regulatory one. Therefore, Section 17 was amended as follows: "If the ~~Department determines after five years of monitoring~~ **results of monitoring**, based on substantial evidence, **conclude** that the FPR**s** ~~regarding Protection and Restoration in Watersheds~~

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			~~with Threatened or Impaired Values (14 CCR § 916.9)~~ are not ~~consistent with~~ **providing adequate protection for** the long-term survival of coho salmon, the Department in cooperation with **CDF and** interested stakeholders will develop ~~and present to the Board of Forestry~~ recommendations ~~for improvements to the rules~~ **to ensure adequate protection for the long-term survival of coho salmon**." Alternative C Section 16 has also been amended as follows: "~~Support continued implementation of the FPR regarding Protection and Restoration in Watershed with Threatened or Impaired Values (14 CCR § 916.9)~~ **The Department, in conjunction with private landowners representatives and experts, and qualified independent scientists with appropriate expertise, and consistent with the availability of staff, the Department will monitor** for five **years (**or more **if necessary to develop an adequate sampling regime) the implementation of the FPR in effect at the time** ~~years to allow for five years of monitoring~~ to determine whether these rules are consistent with the long-term survival of coho salmon.
438	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	Is LWD passage through all culverts necessary for recovery? The impacts of fire suppression have built up huge inventories of LWD that would not be there under unmanaged conditions. We need to be realistic. Recovery does not necessarily mean restoration!	LWD is an essential habitat element for coho salmon, and passage of sufficient LWD in streams occupied or historical occupied by coho salmon is a recovery objective. Recovery and restoration, in the context of coho salmon recovery, are defined in Appendix B. Restoration does not necessarily result in recovery, but effective restoration of specific elements of coho salmon habitat is essential to coho salmon recovery.
439	Mr. Jim Ostrowski Timberland Manager Timber Products Company	There is no need for a separate Forest Management section. The recommendations are too specific and do not recognize the range of conditions in managed	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Yreka	forests.	
440	Mr. Ralph Modine Supervisor, 4th District Trinity County	We are deeply concerned with the proposed forestry alternatives presented in the strategy. For example, the alternatives establish a single canopy objective requirement for streams from the redwood coast to the high elevation white fir stands of the Trinity Alps to the ponderosa pine stands of the high desert areas of Siskiyou County. The 85% canopy retention standard may be appropriate for the deep alluvial soils and humid coastal climates, but it cannot be achieved in many of the interior forests with granitic or ultra-mafic geology and drier climates. The alternatives in the strategy apply a homogenous landscape approach that does not factor in biological, ecological or other natural processes. A rethinking of the approach to forestry should be undertaken outside of the recovery strategy.	As noted by the commenter, inland conditions are typically drier (and warmer) than those found in coastal areas. Consequently retention of vegetation, especially conifers, in inland riparian areas is very important for the maintenance of cool water temperatures and shade. In many instances, retention of existing riparian vegetation is relatively more important inland than it is on the coast.
441	Ms. Noelle Cremers Director, Industry Affairs California Cattlemen's Association Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA) Mr. Peter Ribar Campbell Timberland Management Fort Bragg Mr. John Williams Environmental Resource Solutions Inc. Santa Rosa	The forest landowners' approach is not accurately represented and their unedited proposal should be included in the final recovery strategy as a new Alternative D.	The forest landowners' approach as it was presented to CRT is represented in Sections 1 through 10 of Timber Management Alternatives B and C. See Section 7.24 (pages 7-20 to 7-23 and 7-25 to 7-27). The text of the Timber Management section explains this clearly to the Commission. The forest landowners' approach is within the scope of the alternatives presented to the Commission; therefore, it is the Department's view that the forest landowners' approach need not be included as a separate Alternative D in order for the Commission to consider it.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
442	Mr. Peter Ribar Campbell Timberland Management Fort Bragg	The recovery strategy does not include the site-specific identification and solving of problems that represent the foresters' notion of the proper approach.	Over 85% of the recommendations in the Recovery Strategy are watershed-specific (see page ES-4). Watershed-specific recommendations are often tied to specific rivers and creeks (see Chapter 9). Many activities and issues related to forestry (e.g., road management, sedimentation, and LWD) are already addressed by range-wide and watershed-specific recommendations (See for example, Sections 7.5 and 7.7). Regarding range-wide timber management recommendations, the Commission has yet to make a decision on what to include in the Recovery Strategy relative to timberland management
443	Mr. Michael Laing Conservation Committee Northern California Council Federation of Flyfishers	The NCCFFF supports Alternative A as described in 7.24 items 1-13, Timberland Management Alternatives, of the recently published Coho Recovery Strategy. Our interest in this matter is as a result of our earlier support of Cal Trout and other environmental and watershed protection groups who have been supporting DFG and Regional Water Quality Control Boards with their efforts to address the impacts of timber harvesting on fisheries habitat. We have provided testimony to both the BOF and RWQCB's citing instances where CDF has approved timber harvest plans (THP's) that have led to the precipitous decline in Salmon and Steelhead populations on the North Coast of California.	Comment noted.
444	Mr. Michael Laing Conservation Committee Northern California Council Federation of Flyfishers	Alternative A and B both appear to have similar protections for Class II and III watercourses however Alternative B does not mention any increases for class I WLPZ width and canopy requirements as well as the inner gorge special management zones.	Alternative B was amended to clarify that it assumes the continuation of Threatened and Impaired Watershed Rules and to the extent they are discontinued incorporates them by reference. These rules are identical to the Class I width, canopy and inner gorge elements within Alternative A.
445	Mr. Michael Laing Conservation Committee Northern California Council	Alternative B includes language that is ambiguous…. This ambiguity could lead to unnecessary debate and delay in the THP approval process and result in reduced	The Department does not believe the language is ambiguous. It states (in effect) that based upon an evaluation of project specific circumstances and where

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Federation of Flyfishers	protections.	warranted, the Departm ent will recommend certain measures. It is arguable whether this approach would lead to more or less unnecessary debate and delay or reduced protections than Alternative A.
446	Mr. Bernard F. Bush Director of Regulatory Affairs Simpson Resource Company Korbel	The Department needs to change the emphasis to incentives, specifically with regard to the forest land owners' alternative, which was appended in the Public Review Draft.	Comment noted.
		8: WATERSHED RECOMMENDATIONS	
447	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	The watershed recommendations in many cases are redundant with the range wide recommendations. Only specific recommendations unique to each watershed should be listed. The general roads language is redundant with the Range Wide Recommendations.	The CRT developed recommendations at three spatial scales: range-wide, hydrologic unit, and hydrologic sub-area. When a range-wide recommendation was especially important to a particular watershed, the CRT emphasized this fact by providing a watershed recommendation specific to that topic. That is, some redundancy was intentional.
448	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	Recovery planning needs to emphasize the process for evaluating significant impacts to Coho within a watershed. The Draft should not try and prescribe very site specific restoration measures at this early stage. The Range Wide Recommendations that in many cases specified an information gathering process that would then lead to development of site specific improvements. This will be a more productive approach for Coho recovery.	The Recovery Strategy approach was developed and agreed upon by the recovery teams. Chapter 12 describes the process of evaluating progress of recovery. The Recovery Strategy includes specific recommendations only in circumstances when the Department and the recovery teams deemed the specific information was available.
449	Mr. Larry Moss Smith River Alliance and Northcoast Environmental Center Trinidad	Recommendations on the Smith River and Redwood Creek are good. Some have been implemented during the development of the recovery strategy.	Comment noted.
450	Mr. Jim Ostrowski Timberland Manager Timber Products Company	Some HSA recommendations are much too specific (e.g. Beaver Creek HSA). In addition, some recommendations have been edited to the point where	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Yreka	the meaning has been misconstrued.	
451	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	Recommendations should be tied to significant impacts, not just any possible impact to Coho. For example, grazing is a minimal land use in Beaver Creek and other watersheds in the HSA.	Comment noted.
452	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	The fuels management recommendation for around houses is inadequate to deal with prevention of catastrophic fires. This language fails to recognize the overstocked forest conditions that pose a severe threat for catastrophic fires. This concern was brought to the statewide meeting and we are disappointed that it was so poorly addressed. The language in TR-HY-02 would be appropriate for forest service lands. Widespread fuels treatments are needed to reduce the risk of large fires.	SS-HA-01 was adopted to reduce the risk of fire associated with the intermix and not to address large, severe fires in the watershed as a whole. Language approved by the USFS for the Recovery Strategy could be applied here for addressing fire regime and wildfire originating on forest lands; the Department intends to consult with the USFS and continue to work with the commenter on this issue.
453	Ms. Kallie Kull Program Director FishNet 4C	The watershed recommendations provided for Hydrologic Units within the FishNet region were carefully crafted in conjunction with many of the most knowledgeable people in each of our counties. These recommendations were then presented to the Coho Recovery Team (CRT) via the FishNet Director, who sat as a member of the team. The first draft of the strategy with recommendations for individual watersheds, then went back out to the public for additional review before the CRT finalized and voted on language. Given this fairly thorough process that FishNet members were very active in all along, at this point we endorse the watershed specific recommendations and support their implementation.	Comment noted.
454	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	Proposed 31 specific recommendation additions or changes in the Klamath HU, Mendocino Coast HU.	All recommendations and tasks were discussed evaluated and voted on during the development of the Recovery Strategy. The commenter can work with the Department and the Recovery Teams in the ensuing years to evaluate the suggested revisions

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
455	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	The condition of the estuary and the floodplain areas protected by levees affects the ability of the watershed to maintain coho populations but is not addressed in the recommendations.	The Department did not limit itself to how estuarine restoration would be achieved and are not discounting any available avenues to complete the tasks in the implementation table (page 9-13 Estuaries and pages 9-72 & 9-73, Redwood Creek RC-HU-01 & 02)
456	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	This section does a good job of incorporating the recommendations generated as part of the NCWAP process and included in the Mattole River Synthesis Report.	Comment noted
		8.1.2 SMITH RIVER HYDROLOGIC UNIT	
457	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	Cedar Creek should be added to the list of streams in SR-HU-02.	The Recovery Strategy has been amended to address the comment.
		8.1.3 KLAMATH RIVER HYDROLOGIC UNIT	
458	Mr. Richard Alves United Anglers of California San Jose	Recommend the Governor convene a conference with representatives of the Federal Government, the Governor of Oregon, and appropriate Tribal leadership. A broader perspective of Klamath Basin issues might be able to: a) Resolve the Oregon adjudication in a manner that will keep it out of court. b) Convince the Federal Government to discontinue irrigation on Federal lands. c) Identify additional water sources, such as studying increased wetlands restoration and the Long Valley Reservoir. d) Begin efforts to develop desalinization capability. e) Provide leadership for all jurisdictions demonstrating governmental commitment to recovery efforts.	Comments noted.
459	Mr. Dave Hillemeier	Include the following CRT recommendations that were	All recommendations made by any member of the

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Fisheries Program Manager Yurok Tribe	omitted from the Draft Recovery strategy: *Impose strict performance standards on the Klamath Hydroelectric Project, in terms of water quality effects.* This recommendation, which is lacking from the public draft document, is related to the 401 certification that will be requested from the state of California during the Klamath hydroelectric relicensing process. In light of water quality problems that often exist in the Klamath River, and their potential relationship to the hydroelectric projects in the Klamath River, it is critical for the State to ensure the at any future license for the Klamath hydroelectric project complies with adequate water quality standards. *Improve the ability of the river to assimilate its nutrient load. In particular, investigate the role of the Klamath River Hydroelectric Project in moving nutrient assimilation further downstream into coho habitat.* Given that the Klamath hydro-electric project license being requested by Pacific Corps will pertain to the next 30-50 years, it is essential that all potential effects of the project upon coho salmon be adequately addressed. Failure to do so may result in the extirpation of coho before the next license expires. *Restore appropriate coarse sediment transport near Iron Gate Dam. Means to achieve this could include full or partial project removal, or gravel introduction such as is done below other major dams such as Trinity Dam.* The public draft document has a study component for this recommendation; however it lacks a follow-up implementation component.	CRT were brought before the team, discussed, and voted on. All recommendations were given due consideration by the Department. The Department, other state, federal and local agencies, and the Tribes have suggested a number of studies to PacifiCorp that would address the Project's role in nutrient enhancement, assimilation or dispersal. High nutrient levels have been identified as a potential limiting factor in the Klamath River during certain times of the year and it is believed Project facilities and operation exacerbate these conditions. We anticipate that 401 certification will prescribe nutrient limits as part of the conditions for Project relicensing and, thus, minimize or eliminate Project effects on high background nutrient levels, thereby benefiting coho salmon.
460	Mr. Dave Hillemeier Fisheries Program Manager Yurok Tribe	In light of water quality problems that often exist in the Klamath River, and their potential relationship to the hydroelectric projects in the Klamath River, it is critical	The Department is actively involved in the relicensing process for the Klamath Hydroelectric Project and has provided input and recommendations regarding the

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		for the State to ensure the at any future license for the Klamath hydroelectric project complies with adequate water quality standards.	design and implementation of studies that will address the effects of Project facilities and operation on Klamath River water quality. Successful FERC relicensing of the Project will require 401certification from the State Water Resources Control Board. The 401 certification will include water quality and temperature standards necessary to avoid impairment of the beneficial uses of Klamath River water as described in the North Coast Regional Water Quality Control Board (NCRWWCB) North Coast Basin Plan. Additionally, the mainstem Klamath River has been declared TMDL impaired under the federal Clean Water Act. The NCRWCB is developing a TMDL Plan that includes water quality standards and remedies to bring mainstem waters into compliance. This Plan will address Project impacts on Klamath River water quality. Both actions should provide Klamath Hydroelectric Project water quality standards that are protective of coho salmon.
461	Mr. Dave Hillemeier Fisheries Program Manager Yurok Tribe	CRT recommendation that was excluded: Restore appropriate coarse sediment transport near Iron Gate Dam. Means to achieve this could include full or partial project removal, or gravel introduction such as is done below other major dams such as Trinity Dam. The public draft document has a study component for this recommendation; however it lacks a follow-up implementation component.	Task Number KR-HU-20 (page 9-34) contains the full text of this recommendation.
462	Ms. Jene L. McCovey Native American Coalition for Headwaters Arcata	Blue Creek is a gem in the SONCC ESU. Steep terrain clear cut logging and the slide prone geology choke the mouth of Blue Creek where the gravel bar is 20 feet high from the Klamath River water level. This is an unnatural barrier. The forested land, watershed should not be clear cut anymore. Its dis turbed area is great and the coho reaches will be diminished in the future unless Simpson stops logging on the steep terrain.	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		Blue Creek logging units should be a "SOURCE POINT" of pollution. You can put berms on the down edge of the logging block and capture the runoff water deposits of silt and gravel, actually it still can be called soil. The soil is not leached out and still has the nutrients and micro-organisms. If the berms cannot hold back runoff, it is too steep. The ability to retain soil on the mountains should be looked at. If not, there needs to be a methodology to measure how much earth is moved from the hillside, via roads, slides, and stream crossings.	
463	Ms. Jene L. McCovey Native American Coalition for Headwaters Arcata	The bottom-line is to save refugia. The tribes know where refugia streams are in the Klamath River watershed. Refugia like Blue Creek must be saved.	It is the Department's desire to work with stakeholders. The Department is interested in receiving any data that the tribes have indicating potential coho salmon refugia.
464	Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County Yreka	The recommendation "encourage the …County…to provide adequate budgets basin-wide for road maintenance and upgrades." It should be noted that revenues for road projects come from two sources beyond local control. The primary source of revenue is timber reserve monies. These revenues have been established by formula by Congress, based on upon historic timber harvest in the national forests prior to harvest reduction of the Northwest Forest Plan, and are split with County schools. The authorizing legislation will expire in 2006. The second source of revenue is the gas tax, which is expected to decline due to ethanol incentives paid to Midwest farmers. In addition, the County used to receive about $700,000 in S.B. 2928 funds, but halfway through last year, the Governor evoked a state of emergency allowing discontinuance of payment of these funds to the County.	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
465	Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County Yreka	8.1.3.6 Beaver Creek HSA It appears that road recommendations for Beaver Creek may be designed to support current litigation by several environmental organizations regarding a Klamath National Forest timber sale that had been designed with the input and approval of the Klamath Province Advisory Council. It this is, indeed, the case, I do not feel that it would be appropriate to single Beaver Creek out from other Klamath River watershed with such pointed detail. http://www.fs.fed.us/r5/klamath/projects/projects/beavercreek/indes/shtml	Sedimentation into Beaver Creek is deemed to be an issue for creek health and coho salmon by both the Department and CRT. The Department can assure the commenter that the recommendation and tasks (see page 9-51) have to do with benefiting coho salmon and not litigation. Note: Wherever possible and supportable, the Department and recovery teams tried to identify as specific as possible tasks to contribute to coho salmon recovery. Sediment into this creek was one such example.
466	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	KR-BC-01: Reestablishing natural fire regimes is inappropriate in this watershed and unrelated to recovery of Coho. The fire and fuels management language from the Trinity River, TR-HY-02, would be a better recommendation. Language should be consistent for the same issue in all the watershed specific recommendations and possibly moved to a Range Wide Recommendation.	Watershed-specific language was adopted in different watersheds to suit the specific issues. Reestablishment of fire regimes (KR-BC-01, page 8-15) is targeted for federal lands and is in accordance with the federal agency, USFS, responsible for land management and fire prevention. KR-BC-02 was targeted for private lands. The Department can work with the Timber Products Company and the CRT to discuss change in language to mirror what was adopted for the Hyampom HSA of the Trinity River.
467	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 8-4, KR-HU-02: This adaptive plan should also logically include PacifiCorp, since they act to shape flows downstream of Iron Gate Dam (IGD) for power production purposes.	The Recovery Strategy has been amended to address the comment. Task number KR-HU-02 has been amended to read: "Facilitate the development of an adaptive management plan in preparation for low flow emergencies in cooperation with USBR, NOAA Fisheries, USFWS, DOI, tribes, SWQCB, PacifiCorp and other stakeholders."
468	Mr. Jim Ostrowski Timberland Manager Timber Products Company	KR-BC-06: Developing a Restoration plan for tributaries does not recognize the existing measures and regulations in	Cold water and cold water refugia have been identified as an issue for this HSA. Existing measures would be included in a plan.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Yreka	effect in this HSA. The recommendation is too general and presumptive of a problem that may not even exist. Unless there is a specific site for this recommendation, this should be handled under Range Wide Recommendations.	
469	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	KR-BC-08: What culverts need to be replaced? Is this a significant problem that will aid in recovery or just a wish list of projects? These type of recommendations should be reworded to allow for "evaluation and development of a plan to repair or replace" problem culverts.	KR-BC-08 was adopted because crossing improvement will aid coho salmon recovery. The 4 points on the task (page 9-53) would result in the identification and treatment of specific culverts.
470	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	Recommendation TR-HY-02 adequately addresses fuel reduction and should be applied to the Beaver Creek HSA as well.	TR-HY-02 was adopted for this HSA in the Trinity River Basin. The commenter can work with the Department and recovery teams in the ensuing years to evaluate its applicability to the Beaver Creek HSA of the Klamath River Basin.
471	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	To better understand the Klamath aquatic ecosystem, the council recommends that the Draft Strategy assess what the impacts have been to the coho salmon in the upper basin and how that affects the coho salmon in the lower Klamath Basin and Trinity River Basin.	The Department intends to use all available information in the implementation of the Recovery Strategy.
472	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	The council recommends that the Draft Strategy promote various disease monitoring activities throughout the entire Klamath Basin to determine what the key causes of these and other key diseases are, and subsequently identify measures needed to reduce them.	Most of the Diseases in the Klamath watershed are endemic to that system, meaning that the fish have evolved with them. The conditions of coho salmon susceptibility to disease are briefly outlined in the Recovery Strategy, Chapter 3, Section 3.2. This subject is covered in more detail in the Department's "Status Review of California Coho Salmon North of San Francisco, April 2002."
473	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	The council recommends that the Department increase the ability to track native stocks life history and migratory patterns in order to improve fisheries harvest management practices to better favor native stocks in	The Recovery Strategy addresses these issues of assessment, monitoring, and research in Section 5.4, starting on page 5-23.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		the Klamath tributaries and mainstem	
474	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 8-5, KR-HU-22: Our water bank program already contributes to enhancing Klamath River mainstem flows. We will continue to expand our water bank program as required under the NOAA Fisheries Biological Opinion on 2002-20012 Klamath Project operations.	Comment noted.
475	Ms. Margaret Boland Forest Supervisor Klamath National Forest	Amend KR-SV-03c, KR-BC-08c, KR-IG-03c, etc. : ~~Replace undersized culverts that will not pass 100-year storm runoff, and …~~ Prioritize crossings for upgrade to accommodate 100-year storm runoff and associated bedload and debris, and . . ."	The Recovery Strategy has been amended to address the comment.
476	Mr. Dan Gale Yurok Tribe	KR-KG-04. Note that we have already developed the "Lower Klamath Sub-Basin Watershed Restoration Plan" (Gale and Randolph 2000) that focuses exclusively on the tributaries to the Lower Klamath within the Klamath Glen HSA. As a result, it would probably be more appropriate to reword this recommendation to finalize and/or refine this document.	The Recovery Strategy has been revised to address this comment.
477	Mr. Dan Gale Yurok Tribe	KR-KG-06. Note that this assessment has already been conducted by the Yurok Tribe and the results were released in 2003 in a report entitled "Inventory and assessment of anadromous fish passage barriers in the lower Klamath River sub-basin, California" (Gale 2003).	Task number KR-KG-06 has been revised as follows: "Review existing inventory and assessment of barriers (Gale 2003) and prioritize barriers impeding migration of adult and juvenile coho salmon throughout the Lower Klamath River tributaries."
478	Mr. Dan Gale Yurok Tribe	**KR-KG-06b.** The Yurok Tribe has just received funding from BOR to initiate this study of tributary deltas and sub-surface flow reaches. Involvement from CDFG would be welcome if the Department wishes to participate.	The Recovery Strategy has been amended to address the comment. The Department looks forward to working with the Yurok Tribe on this study.
479	Mr. Dan Gale Yurok Tribe	**KR-KG-11a.** This recommendation should be re-worded as follows to properly capture the intent of the CRT recommendation while also creating a link to the	Range-wide task RW XXXV-A-1 doesn't address determining appropriate locations for gravel mining as much as it outlines the information about an extraction

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		statewide recommendation "Work with Humboldt County, NOAA Fisheries and existing and future gravel-mining operators to restrict gravel-mining operations to appropriate mainstem Klamath locations, as outlined in task RW XXXV-A-1. Gravel mining should not be conducted within lower Klamath tributary watersheds until a scientifically valid and peer-reviewed geomorphic analysis is conducted to determine existing channel stability, causes of excessive aggradation, and identifies gravel mining as an appropriate restorative measure."	strategy that would be necessary for a permit. The phrase "…as outlined in task RW XXXV-A-1" appears to apply to the analysis in the last line of Task KR-KG-11a in its present position.
8.1.4 SALMON RIVER HYDROLOGIC AREA			
480	Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County Yreka	SA-HA-01 Siskiyou County has not compiled an erosion inventory because it has focused its energy for the last few years on its migration barrier removal program (replacing culverts with bridges). Due to budget constraints, the County must find special funding to pay for these improvements. To date the funding has primarily been in the barrier removal projects and not in erosion mitigation. As funding becomes available, and as needed, the County will consider completing the recommended inventory and turn its attention in that direction.	Comment noted.
481	Ms. Margaret Boland Forest Supervisor Klamath National Forest	Amend SA-HA-01a-c: "…. a. Implement Forest Roads Analysis, private and county roads assessment recommendations, and, b. Complete road sediment source inventory on all roads within the Salmon River HAS, and, c. correct identified passage barriers on all roads."	The Recovery Strategy has been amended to address the comment.
482	Ms. Margaret Boland Forest Supervisor Klamath National Forest	Add new objective to Lower Salmon River HSA: Support [the] ongoing maintenance and operations for the Nordheimer Creek Fish Ladder.	The Recovery Strategy has been amended to address the comment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
483	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	The Salmon River Restoration Council has already initiated a Road Management and Fisheries Barrier Work Group Task Force, as a committee of the Klamath-Salmon Learning and Understanding Group (K-SLUG). We have held and performed cooperative planning session, performed inventory, field trips, implementation and monitoring activities. SA-HA-02: ~~Establish a~~ Foster the multi-agency task force to ~~assume~~ develop the implementation program for ~~of~~ barrier removal. This task force would include at a minimum, representatives from Salmon River Restoration Council, Karuk Tribe, USFS, NOAA Fisheries, the USFWS, County, and the Department. Potential Lead: Road Management and Fisheries Barrier Work Group Task Force Interim/Ongoing	The Recovery Strategy has been amended to address the comment. SA-HA-02 replaced with the following: Foster the multi-agency task force to identify and prioritize barriers to fish passage, and implement corrective treatments. Potential Lead: Road Management and Fisheries Barrier Work Group Task Force (Salmon River Restoration Council, Karuk Tribe, USFS, NOAA Fisheries, the USFWS, County, and the Department) Interim/Ongoing
484	Ms. Margaret Boland Forest Supervisor Klamath National Forest	Amend SA-HA-02: ~~Establish a multi-agency task force to assume implementation of barrier removal. This task would include at a minimum, representatives from Salmon River Restoration Council, the USFS, NOAA Fisheries, the USFWS, and the Department.~~ Identify and prioritize barriers to fish passage, and implement corrective treatments, through collaborative efforts with agencies and stakeholders.	Recommendation (and implementation schedule) changed as stated in the above comment.
485	Ms. Margaret Boland Forest Supervisor Klamath National Forest	Amend SA-HA-03: Support efforts to educate and train landowners, restoration specialists, and watershed restoration groups **through** the Salmon River Restoration Council on techniques to reduce the impacts of private roads on coho salmon.	The Recovery Strategy has been amended to address the comment.
486	Ms. Margaret Boland Forest Supervisor Klamath National Forest	Amend SA-HA-04 and 4b: ~~Support the ongoing efforts of the Salmon River Restoration Council to deal with invasive exotics using~~	The Recovery Strategy has been amended to address the comment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		~~integrated past management.~~ "Encourage collaborative efforts among agencies and stakeholders to control or remove invasive exotics using integrated pest management techniques." ~~Request the USFS support the on-going efforts of Salmon River Restoration Council to manually remove invasive exotics as part of integrated pest management program.~~	
487	Ms. Margaret Boland Forest Supervisor Klamath National Forest	Amend SA-HA-04 and 4b: ~~Investigate how the USFS is dealing with riparian and aquatic conservation in Northwest Forest Plan regarding fire suppression and fuels management and encourage the USFS to consider coho salmon in their overall fuel management plan.~~ Reestablish fire regimes consistent with Northwest Forest Plan objectives to reduce the risk and impact of large, severe fire on coho salmon.	The Recovery Strategy has been amended to address the comment.
488	Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County Yreka	SA-HA-06 This recommendation pertains to implementation of the Northwest Forest Plan on federal lands and would appear to be beyond the scope of the state recovery plan and inappropriate.	The recovery strategy identifies many actions that would aid in recovering coho salmon. Implementation of the Northwest Forest Plan on federal lands is one of the identified actions. Although it pertains to the federal government and federal lands, the Department believes the recommendation is appropriate. The recovery strategy identifies recommendations for potential action entities such as the federal, state, and local government action, as well as private landowners and other interested persons. Recovery of coho salmon will require cooperation and collaboration among federal, state, local governments and communities.
489	Ms. Margaret Boland Forest Supervisor Klamath National Forest	Remove SA-HA-07 This statement is out of place in a restoration plan. ~~Recognize the Salmon River Restoration Council's value for cost-effective education and restoration.~~	The Recovery Strategy has been amended to address the comment.
490	Ms. Margaret Boland Forest Supervisor	Remove SA-HA-08. The USFS will continue to work with all sub-basin agencies and stakeholders, including the	The Recovery Strategy has been amended to address the comment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Klamath National Forest	SRRC. : ~~Encourage the USFS to continue working closely with the Salmon River Restoration Council~~.	
		8.1.5 SHASTA VALLEY AND SCOTT RIVER HYDROLOGIC AREAS	
491	Mr. Jim Ostrowski Timberland Manager Timber Products Company Yreka	Recommendation SS-HA-01 focuses on fuel reduction around residential structures and homes to prevent fire from spreading to adjacent forest lands. This does not adequately address fuel reduction needed to prevent catastrophic fire in the watershed.	SS-HA-01 was developed and approved to address the issue the commenter mentioned and was not intended to address fuel reduction in the watershed. Range-wide tasks in table 9-1 address the broader, more general watershed issues.
492	Ms. Margaret Boland Forest Supervisor Klamath National Forest	Amend SS-HA-04: "…and upgrade crossings to provide coho…"	The Recovery Strategy has been amended to address the comment.
493	Ms. Margaret Boland Forest Supervisor Klamath National Forest	Amend SS-HA-09b: ~~Replace undersized culverts that will not pass 100-year storm runoff, and …~~ Prioritize crossings for upgrade to accommodate 100-year storm runoff and associated bedload and debris, and . . ."	The Recovery Strategy has been amended to address the comment.
494	Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County Yreka	SS-HA-10 The recommendation on the Scott River raises the issue of the USFS exercising its "right to stream flow in the Scott River for fish and wildlife within the Klamath National Forest under the Scott River Decree." This issue was recently discussed by the Klamath River Fisheries Task Force at its October meeting. Forest Supervisor Peg Boland publicly explained that this had already been explored and that the Forest Service had determined that it has no action that it could take. The DFG was present during that discussion.	There may still be value in assessing the potential benefits of the USFS right to stream flows in the Scott River, particularly as interim in-stream flow targets for coho salmon until such time as comprehensive in-stream flow studies can be conducted. Task number SS-HA-10 has been amended based on input from the USFS (see response to comment below).
495	Ms. Margaret Boland Forest Supervisor Klamath National Forest	Amend SS-HA-10: Assess the potential benefits and technical feasibility of ~~exercising the USFS right to~~ increasing stream flows in	The Recovery Strategy has been amended to address the comment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		the Scott River for fish and wildlife within the Klamath National Forest ~~under the Scott Decree~~. This should be dealt with during the verification described in SSRT water management recommendations.	
496	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 8-22, SS-HA-11: PacifiCorp should be designated the lead agency for this study effort, not Reclamation. Reclamation is willing to participate in the study, but it has no authority to adjust IGD flow, as this is under the jurisdiction of PacifiCorp.	Flow releases by PacifiCorp at Iron Gate Dam are constrained by the USBR via upstream storage and diversions to the Klamath Project. Minimum flow releases at Iron Gate Dam are dictated by the NOAA Fisheries 2002 Biological Opinion (BO) on the effects of the Klamath Project on coho salmon. The Department therefore believes that the USBR continues to have a major role in this study effort.
497	Mr. Dave Hillemeier Fisheries Program Manager Yurok Tribe	CRT recommendation that was excluded: SS-HA-34: The proposed five year Incidental Take Permit shall clearly cite as conditions, compliance with laws, codes, regulations and ordinances referenced in SS-HA-33. We see no reason to exclude a recommendation to ensure compliance with existing laws, codes, regulations and ordinances.	This recommendation was not included in the Recovery Strategy because the CRT failed to reach consensus on the substance of the recommendation. Task Number P-7 (page 10-49) within the Shasta-Scott Pilot Program recommends the enforcement of existing laws, codes, regulations and court decrees that are relevant to coho salmon recovery.
498	Ms. Jene L. McCovey Native American Coalition for Headwaters Arcata	Recovery must address pollution in the Shasta Valley and Scott River watersheds (e.g., herbicides).	At the range-wide scale, RW-V-B-01 addresses water quality. It is the understanding of the Department that the Regional Water Quality Control Boards in California are formulating plans to reduce pesticide runoff (page E-66). At this point there are tasks to assess pesticide levels in the Shasta Scott Pilot Program (MA-1d, page 10-50) and to follow NCRWQCB suggested Best Management Practices in the Cape Mendocino - Southern Mattole Subbasin (CM-MS-06).
		8.1.8 REDWOOD CREEK HYDROLOGIC UNIT	
499	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National	The discussions and recovery actions for Redwood Creek do not adequately highlight the importance of mainstem Redwood Creek to coho recovery efforts.	For each watershed, mainstem issues are included under both the HU level and the HSA levels.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	and State Parks (RNSP) Crescent City	Outside of the Prairie Creek sub-watershed, the mainstem of Redwood Creek represents about 70 percent of all accessible anadromous salmonid habitat in the Redwood Creek watershed (California Resources Agency. 2002. The North Coast Watershed Assessment Program Draft Redwood Creek Watershed Synthesis Report. February, 2002. California Resources Agency). In mainstem Redwood Creek, there is much potential coho habitat and historically CDFG described deep mainstem pools in the lower river that contained coho salmon juveniles. Language that includes mainstem rivers should be included in all the range wide and watershed recommendations.	
500	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	Additional Recommendation for Redwood Creek. Continue to review THPs with regard to potential impacts to coho salmon and their habitat. RNSP and the Department of Parks and Recreation (DPR) have been reviewing THPs throughout the watershed since 1978. This review and the cooperation of landowners have resulted in better THPs that address sedimentation from roads.	A new recommendation has been added to Section 8.1.8 Redwood Creek HU as follows: "Continue to review and improve THPs with regard to protection of coho salmon and their habitat." This recommendation also appears as a new Task in Table 9-2 Implementation Schedule for the SONCC Coho ESU under Redwood Creek HU. It has been given Task Level 'E', Identified Action Entities include "Department, RNSP, DPR, CDF, Landowners" , and the Estimated Duration is "Interim, Ongoing."
501	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	Recommendation RC-HU-1 should include language to address acquiring easements or titles to land in floodplain currently protected by levee, to restore flood plain function.	The Department did not limit itself to how estuarine restoration would be achieved and are not discounting any available avenues to complete the tasks in the implementation table (page 9-13 Estuaries and pages 9-72 & 9-73, Redwood Creek RC-HU-01 & 02)
502	Mr. Donald Comstock Orick	Restoring the estuary requires removing the existing levee, which protects the community of Orick and adjacent landowners, I would oppose that effort. Such action would come at the expense of agricultural land.	Protection of Highway 101 and the town of Orick is one of the primary requirements of the plan to improve estuary habitat conditions in RC-HU-01. In view of this need for protection, modification rather than complete removal of the current levee system is being

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		Restoring riparian habitat is a two edged sword. The vegetation frequently chokes the stream channel causing the stream to meander. This does not contribute to development of a producing spawning ground. Substantial maintenance will be required. Additionally, such habitat can be used to limit the use of adjacent property.	investigated. The recommendation also includes input from private landowners in this process. The decision to modify the existing levees would certainly not be made without public consensus, especially where the socio-economic values of private land could be impacted.
503	Mr. Donald Comstock Orick	RC-HU-02 is straight from the Humboldt County Planning Department and is directed more to removing the County's obligation to maintain the existing levee than to the propagation of salmon. I would urge you to consider ways of improving salmon habitat with the existing levee as properly maintained.	Humboldt County is required to maintain flood channel capacity, but we believe there is potential to modify the levees and improve salmon and steelhead populations while maintaining flood control. Construction of the existing levee resulted in the loss of up to 75% of all wetland riparian resources, filling of at least 50% of the lower estuary, and sand and gravel deposition within the levee corridor.
504	Mr. Donald Comstock Orick	RC-HU-04 is from the Water Quality Control people. The actual problem sediment is having on salmon in the lower reaches of Redwood Creek has not been measured and is unknown.	Stream sinuosity is a natural feature of stream channels which develops pools and riffles. Similarly, instream wood structure also plays a part in bank stability, pool formation, routing sediment and sorting gravels, although spawning will be minimal in Redwood Creek below Highway 101. These processes are necessary for restoration of lower Redwood Creek to a naturally productive salmonid ecosystem.
505	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	RC-HU-03 c. mentions the control of alders as a competitor of conifers to improve riparian zones. Any control policy should balance the benefits provided by alders (e.g. stream cover and shading, cooler water temperatures, leaf and invertebrate drop, and erosion control) versus their control. The wholesale removal of alders could be construed from the existing language and should be modified to reflect a balanced approach to riparian improvement.	A change was made to the implementation schedule to reflect a balanced and region-appropriate approach to alders.
8.1.9 TRINIDAD HYDROLOGIC UNIT			

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
506	Mr. Doug Smith Humboldt Watershed Council Arcata	Little River. The Department allowed a land owner to put cars into the stream bed and re-contour the stream. Prosecution never occurred. The recovery strategy should include a recommendation for an investigation and removal of the cars.	Old cars were placed by the landowner for erosion control at some time in the past, before this practice was banned in the state. When levee construction and movement of bed material was undertaken without a permit two years ago, the Department pursued enforcement action for a violation of the FGC regarding Streambed Alteration through the District Attorney's office. However, the proposed mitigation plan was not resolved. Task number TP-LR-03, developed by members of the CRT, was modified as follows "Appropriate agencies should enforce any violation of law that occurred from construction of cranberry bogs in the Little River**;** completion of appropriate mitigation should be enforced**."**
8.1.11 EEL RIVER HYDROLOGIC UNIT			
507	Mr. Harry Vaughn Eel River Salmon Restoration Program Miranda	The South Fork Salmon Creek should be identified as the best chance for focusing restoration activities.	The Department's observations and surveys of the South Fork Salmon Creek indicate that passage upstream to low gradient habitat would be very difficult for coho salmon as there are high gradient/high velocity reaches in the mainstem Salmon Creek and the lower South Fork. While the focus of the Recovery Strategy is for coho salmon, these areas may hold potential for other salmonids, as indicated by the commenter.
8.2.1 MENDOCINO COAST HYDROLOGIC UNIT			
508	Mr. Harry Vaughn Eel River Salmon Restoration Program Miranda	Sproul Creek should be a donor stream to nearby tributaries.	Donor populations for reintroductions need to be considered on a case-by-case basis to maximize the probability that the introduction will be successful, to maintain existing patterns of genetic diversity, and to minimize impacts to both donor populations and the receiving environment. The Department strives to use

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			all available information and to choose the best donor populations for reintroductions. Some examples of the deciding factors for choosing donor populations can be found in Appendix I of the Recovery Strategy.
509	Ms. Kathleen Morgan Monitoring Coordinator Gualala River Watershed Council	Page 8-46, 8.2.1.7 Gualala River HSA, MC-GU-03: The citation is incorrect please change (Higgins, Keegan Estuary Study) to read (Kamman, Keegan, Estuary Study, 2003).	The Recovery Strategy has been amended to address this comment. The citation in MC-GU-03 was changed to: Kamman, Keegan, Estuary Study, 2003.
510	Ms. Kathleen Morgan Monitoring Coordinator Gualala River Watershed Council	Page 8-46, 8.2.1.7 Gualala River HSA, MC-GU-07: The Council is concerned that limiting this recommendation to Haupt Creek could potentially hinder the acquisition of other suitable old growth stands within the watershed. We suggest this recommendation should be broadened to: "Consider the acquisition/easement of old growth redwood sections where necessary to protect Coho salmon."	The CRT developed this recommendation to target habitat on Haupt Creek; focusing on one creek should not diminish opportunities for acquisitions/easements of other important habitat. The commenter's suggested change is similar to a range-wide recommendation and would be duplicative.
511	Ms. Kathleen Morgan Monitoring Coordinator Gualala River Watershed Council	Additionally, the lack of summer surface flow continues to be a limiting factor in many tributaries within the Gualala. The increased demand for water diversions could potentially cause negative impacts on habitat restoration efforts. We suggest that you include a recommendation to study water quantity; specifically, the impact diversions may have on surface flow.	The flow issue is covered under range-wide recommendations and MC-GU-03 and MC-GU-11.
512	Ms. Kathleen Morgan Monitoring Coordinator Gualala River Watershed Council	MC-GU-07 and MC-GU-07b do not identify Sonoma Co. as action entities even though the majority of Gualala watershed is in Sonoma Co.	Added Sonoma Co. as identified action entity under "Others" in recommendations MC-GU-07, MC-GU-07b, MC-GU-09, MC-GU-11, MC-GU-11b, and MC-GU-13.
513	Ms. Kathleen Morgan Monitoring Coordinator Gualala River Watershed Council	Include a recommendation to study water quantity and impacts of diversions on surface flow.	Partially covered under recommendation MC-GU-11 and MC-GU-11b.
514	Mr. Matt Goldsworthy	The Albion and Garcia Rivers have long lists of	The Recovery Strategy is designed to be long-term

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Aquatic Biologist Mendocino Redwood Company Fort Bragg	recommendations, yet other areas (i.e. Big River) with similar land use history do not have as comprehensive a list. We recommend that Big River (and potentially other similar coastal watersheds) have recommendations for erosion/sediment control and riparian improvements for LWD recruitment and shade. Big River is listed on the 303(d) list as impaired for sediment and temperature; it follows that to assist coho salmon recovery in Big River these impairments need to be addressed. Adding these recommendations to the Big River watershed will likely assist a landowner's ability to utilize public grant funds to assist with coho salmon recovery.	and to be updated and revised annually, both in collaboration with the recovery teams and other interested parties. The Department looks forward to being able to work the Mendocino Redwood Company to give more focused attention to the recommendations and needed actions in Big River, and the Department will strive to do so in the ensuing years of implementation of the Recovery Strategy.
515	Mr. Matt Goldsworthy Aquatic Biologist Mendocino Redwood Company Fort Bragg	We believe that exotic species need to be addressed more thoroughly throughout the plan, including recommendations to control this problem. Exotic species are known to be present in the majority of coho salmon bearing watersheds in both the SONCC and CCC (Eel River and tributaries, Noyo River, Big River, Albion River, Navarro River, Russian River) and the impacts and widespread nature of this problem warrant further investigation and planning.	Exotic species were discussed by the CRT in preparation of the Recovery Strategy. Your concern and suggested actions regarding exotic species' impacts on coho salmon juveniles is warranted, and addressed at the range-wide level in recommendations RW XVIII-A-01, XVIII-A-02, and XVIII-A-03.
516	Mr. Matt Goldsworthy Aquatic Biologist Mendocino Redwood Company Fort Bragg	Albion River HSA Recommendations: Several dams near the town of Comptche warrant consideration. These dams have reduced available salmonid habitat (by disconnecting habitat which was historically utilized by coho salmon). Also, these dams alter instream summer flows and may also increase summer water temperatures. The ponds or reservoirs formed by these dams also 'seed' the Albion River and its tributaries with exotic species and disease. Several exotic species have been documented to occur in the Albion River as a result of (illegal) introductions of exotic fish into the ponds. Large mouth bass, green sunfish, brown bullhead, and bullfrog	The Recovery Strategy is designed to be long-term and to be updated and revised annually, both in collaboration with the recovery teams and other interested parties. Your concern and suggested actions regarding exotic species' impacts on coho salmon juveniles is warranted, and addressed at the range-wide level in recommendations RW XVIII-A-01, XVIII-A-02, and XVIII-A-03. The Department intends to work with the Mendocino Redwood Company to bring the specifics of exotic species issues to the recovery teams for discussion and further consideration. For the Albion River, the Department looks forward to

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		larvae have been observed during summer months in the Albion River near the confluence of the North Fork Albion River (MRC, unpublished results of 2003 Salmonid Distribution Studies). Exotic species commonly escape or are swept over the dams during high flows, or possibly have established viable populations within the Albion River. It is uncertain as to whether viable populations of exotic species exist in the Albion River, or if exotic species observed in the Albion River are 'wash-downs' from the previously mentioned ponds. Regardless, exotic species rear in the Albion River and its tributaries throughout the summer, competing with and predating upon juvenile coho salmon. The presence of these exotic species may have deleterious impacts on juvenile coho salmon rearing in the Albion River and its tributaries. Fish screens or racks should be required on dams or ponds that are hydrologically connected to a watercourse to prevent exotic species from entering the river. Funding should be provided through grants to remove these dams to restore additional habitat to coho salmon, install fish screens to prevent escapes of exotic species, or control populations of exotic species residing in ponds.	being able to work the Mendocino Redwood Company to address: - dams, water flow, and water temperature; and, - exotic fish species.
517	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	NCWAP completed a 5-agency interdisciplinary watershed assessment for the Gualala River HSA in March of 2003. While the tasks listed are responsive in a general sense to some of the recommendations from the NCWAP report, they are far from inclusive. The Plan should include the NCWAP recommendations for the Gualala subbasins or explain why this relevant, significant and useful effort was not used.	The NCWAP report for the Gualala River was utilized in development of the Recovery Strategy. The commenter can work with the Department and the recovery teams in the ensuing years to re-evaluate the report as to its application to coho salmon recovery.
8.2.2 RUSSIAN RIVER HYDROLOGIC UNIT			

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
518	Mr. Brock Dolman Occidental	Did not see that gravel mining was addressed in the mainstem of the Russian River.	Gravel mining is addressed as a land use in Section 3.6.5 (page 3-16) and again for the Russian River (page 6-65) as was the potential problems of gravel quality and quantity. Since Gravel mining is a range-wide issue, recommendations are addressed in the range-wide recommendations, Section 7.22.
519	Mr. R. Brian Hines Secretary Trout Unlimited of California	The Coho Recovery plan should recommend conservation and reuse options and oppose River Discharge options for waste water in the critical habitat of the Coho including the Russian River Mainstem, the Laguna de Santa Rosa, Mark West and Santa Rosa Creeks. Conservation and reuse will also result in additional benefits to Coho Salmon by addressing the Water Quantity limiting factor… The Coho Recovery plan should also recommend to the North Coast Regional Water Quality Control Board that attempts to rely on "mixing zones" to justify waste water discharges to the above HSAs that violate the California Toxic Rule should be disallowed.	The commenter can work with the Department and the recovery teams in the ensuing years to evaluate this recommendation and its application to coho salmon recovery.
520	Mr. R. Brian Hines Secretary Trout Unlimited of California	The Coho Recovery plan should include the recommendation included in the "2002 Draft Russian River Basin Fisheries Restoration Plan" in the section, "Gravel Quantity, Restorative Actions" as it applies to development of a watershed Sediment Budget as follows: "Individual Aggregate Resource Mining (ARM) plans exist for each County, but no agency or element monitors aggregate movement or replenishment on a watershed or "sediment budget" basis. A sediment budget needs to be developed for the river and a sustainable mining plan needs to be developed. County ARM's would then need to be modified to reflect source and replenishment issues and local jurisdiction".	Covered under range-wide recommendation RW-XXXV-A-01.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
521	Mr. Brock Dolman Occidental	Recommendation RR-GU-06: Identifying water diverters. Supports this recommendation. Dutch Bill Creek dries up. He supports hydrologic regime studies.	Comment noted.
522	Mr. Brock Dolman Occidental	Recommendation RR-HU-18. Supports the recommendation, but it needs to also include the city and needs more discussion of water quality, including endocrine system -interfering compounds.	RR-HU-18 is modified as follows: Support efforts and develop county, <u>city, and other local programs</u> to protect and increase instream flows for coho salmon. Recommendations RW-V-B-01, RW-VI-B-01b, RW-VI-E-01 (page9-9) address water quality range-wide.
		8.2.3 BODEGA AND MARIN HYDROLOGIC UNITS	
523	Ms. Pamela J. Nicolai General Manager Marin Municipal Water District	Recommendation BM-WA-08 (page 8-54), for Walker Creek, states: "Encourage MMWD to continue to assess the release of water from Soulajule Reservoir to develop the optimum release for coho salmon." MMWD makes releases from Soulajule Reservoir into Walker Creek, to support fisheries, under an agreement with the Department of Fish and Game (Department). Under the agreement, both MMWD and the Department were to monitor the effects of flows on the fishery. Therefore, we suggest the wording of the recommendation be revised to read, "Encourage MMWD and the Department to continue to monitor the effects of their instream flow agreement for Walker Creek, as is called for in the agreement."	The commenter is referring to recommendation BM-WA-07 which has been changed as requested: "Encourage Marin Municipal Water District <u>and the Department</u> to continue to assess the release of water from Soulajule Reservoir<u>, as called for in their cooperative agreement,</u> to develop the optimum release for coho salmon."
524	Ms. Pamela J. Nicolai General Manager Marin Municipal Water District	Recommendation BM-LA-05 (page 8-55), for Lagunitas Creek, refers to water conservation in the context of the ten-year State Water Board order. MMWD has made a strong commitment to and has had great success with its water conservation programs for some three decades but not in the context of its Lagunitas Creek fisheries program. The State Water Board order puts no requirements on MMWD for conservation. MMWD will continue in its conservation efforts but reference to water conservation is not directly related to this	Recommendation BM-LA-05 changed to read as follows: "~~Encourage MMWD to commit ongoing resources~~ <u>Continue ongoing efforts</u> and support of stewardship in the basin beyond the 10-year mitigation order that expires in 2007 to include: riparian enhancement … to benefit coho salmon." Add MMWD as Identified Action Entity under "Others"

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		recommendation. It seems an inappropriate recommendation unless applied to all other agencies. The aforementioned recommendation is another example of where MMWD is specifically identified, however, there are other agencies that have been and should be encouraged to continue to contribute to stewardship efforts in Lagunitas Creek. Those agencies include the Department, the Regional Water Quality Control Board, and the County of Marin. Also, the recommendation suggests MMWD "commit ongoing resources and support of stewardship"… We find the term "commit" to be unnecessarily strong where other recommendations call for actions that support, develop, or continue a recovery strategy. Please rephrase this recommendation deleting the term "commit."	
525	Ms. Pamela Nicolai Marin Municipal Water District	Recommendation #BM-WA-07 (page 8-54), for Walker Creek, … we suggest the wording of the recommendation be revised to read, "Encourage MMWD and the Department to continue to monitor the effects of their instream flow agreement for Walker Creek, as is called for in the agreement."	Recommendation (and related implementation schedule) BM-WA-07 replaced with the following: "Encourage MMWD and the Department to continue to assess the release of water from Soulajule Reservoir, as called for in their cooperative agreement, to develop the optimum release for coho salmon."
526	Ms. Pamela Nicolai Marin Municipal Water District	Recommendation #BM-LA-05 (page 8-55), for Lagunitas Creek, refers to water conservation in the context of the ten-year State Water Board order. MMWD has made a strong commitment to and has had great success with its water conservation programs for some three decades but not in the context of its Lagunitas Creek fisheries program. The State Water Board order puts no requirements on MMWD for conservation. MMWD will continue in its conservation efforts but reference to water conservation is not directly related to this recommendation. It seems an inappropriate recommendation unless applied to all other agencies.	Recommendation (and related implementation schedule).BM-LA-05 changed as requested

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
527	Ms. Pamela Nicolai Marin Municipal Water District	The aforementioned recommendation … suggests MMWD "commit ongoing resources and support of stewardship"… We find the term "commit" to be unnecessarily strong where other recommendations call for actions that support, develop, or continue a recovery strategy. Please rephrase this recommendation deleting the term "commit."	Recommendation (and related implementation schedule) BM-LA-05 (page 8-55) replaced with: "Work with the MMWD to continue the ongoing efforts and support of stewardship in the basin beyond the 10-year mitigation order …"
8.2.4 SAN FRANCISCO BAY HYDROLOGIC UNITS			
528	Ms. Betsy Wanner Bikle, President Mill Valley StreamKeepers	We concur strongly with the…recommendation that Arroyo Corte Madera del Presidio, within the San Francisco Bay Hydrologic Unit, be designated as a priority coho restoration stream.	Comment noted.
8.2.6 BIG BASIN HYDROLOGIC UNIT			
529	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	The recommendation for bypass flows on key San Lorenzo reaches ought to be extended to all major diversions in the system, and must be in deference to water rights seniority in order to have successful implementation.	Comment noted.
9: IMPLEMENTATION			
530	Mr. Dave Hillemeier Fisheries Program Manager Yurok Tribe Mr. Felice Pace Klamath Forest Alliance Klamath Glen Mr. Glen H. Spain Northwest Regional Director PCFFA and IFR Mr. Thomas J. Weseloh	In light of the limited financial resources that are likely to be available for coho recovery, we recommend that a handful of priority recommendations be identified for each HU that are most essential for coho recovery (e.g. ensuring that scientifically determined flows remain in streams). Implement actions in 2 tiers. Identify 5 actions in each watershed that will be most cost-effective and identify two more to be implemented after the first 5 are done. A list of priority actions would be a good addition, and would encourage the Commission to adopt this Plan.	The CRT recognized the need for prioritization and prioritized not only watersheds but also tasks for each watershed. Tasks are not prioritized in a linear or temporal fashion, but rather as to their relationship to contribution to recovery. See Chapter 9 for recommendations with a task level of "E" denoting the highest level priority for implementation. Also note that Interim tasks were the tasks identified to occur in the next 5 years.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Northcoast Manager California Trout McKinleyville	The guide should emphasize the highest priority recommendations for the first 5 years or a top 100 list.	
531	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	There needs to be user's guide to chapter 9 that prioritizes range-wide and HSA actions.	Comment noted.
532	Mr. Richard Ridenhour McKinleyville	There does not appear to be commitment of any of the entities to actually implement the final and approved Strategy. Without some indication of commitment, this impressive effort by many more than likely will end up, as has been the case with too many prior planning documents, on the shelf. Clearly, implementation will be largely a political problem and I did not see where there have been efforts to involve the appropriate levels of the governments as the Strategy was being developed. With the current economic climate, such a costly program is not likely to succeed without very strong political support.	Chapter 12 includes the most immediate commitments by the Department. A recovery strategy is a guidance document and non-regulatory. The Department intends to continue to work with other agencies to ensure that the Recovery Strategy is implemented.
533	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	The draft report meets the criteria of F&G Code section 2109 of a range of alternative interim and long-term actions only in a cursory manner, however looking at Table 9-1: Implementation Schedule for Range-Wide Recommendations it is very clear that the department's classification is very general, and not detailed enough to give clear guidance.	Each action in Table 9-1 is identified as interim, ongoing, long-term, and/or continual. These designations meet the requirement of FGC § 2109. The combination of the task level and duration give clear guidance.
534	Mr. Harry Vaughn Eel River Salmon Restoration Program Miranda	I am hopeful that projects are driven by prioritization and not by money to create new bureaucracies help contractor pocketbooks.	Comment noted.
535	Mr. John Ricker County of Santa Cruz	p. 9-2: Implementing entities should include Resource Conservation Districts, which have a significant role in public outreach, technical assistance, and coordination of restoration efforts.	The Recovery Strategy has been amended to address the comment. Added to Section 9.4 (p. 9-2): Resource Conservation Districts

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
536	Mr. Sterling McWhorter Petrolia	TMDL implementation won't be fast or possible, and he hopes the process goes nowhere.	Comment noted.
537	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	Two of the hydrologic units (HU) within Redwood National and State Parks, the Smith River HU and Redwood Creek HU are not prioritized in the implementation schedule. Will a priority be assigned at the HU level, not just the hydrologic subunit area (HSA)?	Priority levels were not assigned at the HU level, because most HUs contained HSAs with different levels. However, all of the Smith River HSAs were priority 4. In Redwood creek, the three HSAs are assigned 5, 3, and 2, as you move inland.
538	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	For many of implementation task descriptions for the HUs, the California Conservation Corps (CCC) should be identified as an action entity. Mentioned in the Redwood Creek HU, they are not in other hydrologic units. Much of the restoration work conducted on the north coast could not have been accomplished without the CCC.	The Recovery Strategy has been amended to address the comment. CCC added as an action entity.
539	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	Page 9-29, SR-HU-02: Assess and prioritize barriers in Clarks Creek, located in Jedidiah Smith Redwoods State Parks. DPR and RNSP should be included in the identified action entities.	The Recovery Strategy has been amended to address the comment.
540	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	(page 9-30) SR-HU-05d Continue to review THPs. Include RNSP and DPR as identified action entities.	The Recovery Strategy has been amended to address the comment.
541	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	RC-HU-02: Modify levee requirements …. RNSP and CDFG are identified twice as the action entities.	The Recovery Strategy has been amended to address the comment.
542	Mr. Tom Hofweber Supervising Planner County of Humboldt	RC-HU-02 should be revised to refer to Humboldt County Public Works Department, rather than the Planning Department.	The Recovery Strategy has been amended to address the comment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Eureka		
543	Ms. Kathleen Morgan Monitoring Coordinator Gualala River Watershed Council	Two thirds of the Gualala watershed is in Sonoma County but Sonoma County is not listed as an "Action Entity" although Mendocino County seems to be listed in most categories. Under items MC-GU-07 & -07b Mendocino County is listed as an action entity but the area in question for acquisition is in Sonoma County.	The Recovery Strategy has been amended to address the comment.
544	Ms. Pamela J. Nicolai General Manager Marin Municipal Water District	We find it notable that MMWD is specifically mentioned with regards to some specific recovery recommendations for the Bodega and Marin Coastal Hydrologic Unit but there are no such references to similar agencies in other watersheds. While MMWD recognizes it has certain responsibilities, commitments, and voluntary programs, we are perplexed as to why other entities in other areas are conspicuously absent from being specifically named in the recommendations. We are concerned that voluntary actions by MMWD would, over time, transition into a perceived mandate with the burden of implementing recovery falling solely upon MMWD. We see this document as being important in establishing programs at both the State and Federal level and are concerned that the perception left would affect the possible future funding of activities through grants. We believe all parties with responsibilities for coho recovery should be identified in the report; otherwise we request that the specific references to MMWD be deleted from the report. Stakeholders will be more likely to participate in the recovery effort if they know that all other stakeholders are also doing their fair share.	MMWD is identified specifically in three recommendations: - BM-WA-07 (changed as requested) - BM-LA-05 (changed, MMWD removed from recommendation) and added to column "Identified Action Entities) under "Others". - BM-LA-16 (unchanged) MMWD is mentioned in specific watersheds because a CRT member developed the recommendation with that level of specificity. Other water districts may not have been called out in the current document; however, the Department still intends to work with water districts on many of the flow and flood control issues addressed in the Recovery Strategy for other watersheds and, hopefully, add these other agencies to the list of entities. The Recovery Strategy remains a guidance document and does not present a mandate to any of the named parties.
545	Ms. Pamela J. Nicolai General Manager Marin Municipal Water District	It is not clear to whom this report is directed or who the audience is. For example, when a recommended strategy is to "encourage" a particular action, it is not clear who is to do the encouraging. The implementation	The Recovery Strategy is a guidance document and is non-regulatory. The Department attempted to provide clarification for terms used in the recommendations, such as encourage and support. These clarifications

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		chapter certainly identifies lead entities to implement a recommendation but it is not clear who would direct their efforts. We understand that recovery will take a collaborative effort of many agencies, organizations, and individuals, but the final report should be clear as to whom the report is directed. Otherwise, there is no assigned responsibility as to who is the driving force behind the recovery plan. Many of the recommendations use the phrases "encourage" and "support." These terms need to be defined in the final recovery plan, especially "encourage," as they can be interpreted in many ways and could have a variety of implementation strategies (i.e., voluntary, financial, or regulatory). What is meant by these terms?	are found in the implementation schedule. The responsibility to implement this document lies with the Department, who intends to work closely with other agencies to ensure that the tasks are undertaken.
546	Mr. Dan Gale Yurok Tribe	Change entries for implementation of Klamath Glen HSA recommendations as follows to reflect current land ownership and land management responsibilities and activities: **KR-KG-03** Potential Lead: Yurok Tribe Others: Simpson, USFS, NOAA Fisheries, CDFG, USFWS **KR-KG-03b** Potential Lead: Yurok Tribe/Simpson Others: USFS, CDFG, CCC, SCC **KR-KG-04** Potential Lead: Yurok Tribe Others: Simpson, USFS, NOAA Fisheries, CDFG, USFWS **KR-KG-04b**	The Recovery Strategy has been amended to address the comment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		Potential Lead: Yurok Tribe/Simpson Others: USFS, CDFG, CCC, SCC **KR-KG-05** Potential Lead: Yurok Tribe/Simpson Others: USFS, CDFG, CCC, SCC **KR-KG-06** Potential Lead: Yurok Tribe Others: Simpson, CCC, CDFG, SCC, CalTrans, Del Norte County **KR-KG-06b** Potential Lead: Yurok Tribe Others: Simpson, CCC, CDFG **KR-KG-06c** Potential Lead: CDFG/Yurok Tribe Others: Simpson, CCC, NOAA Fisheries **KR-KG-07** Potential Lead: Yurok Tribe/Simpson/CCC Others: USFS, CDFG, SCC **KR-KG-08** Potential Lead: Yurok Tribe/CDFG Others: Landowners, CCC, CDF, SCC, NOAA Fisheries **KR-KG-08b** Potential Lead: Yurok Tribe/Simpson/CCC Others: Landowners, CDFG, CDF, SCC, NOAA Fisheries **KR-KG-10a** Potential Lead: CCC/Yurok Tribe Others: Landowners, CDFG	

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		KR-KG-10b Potential Lead: Yurok Tribe Others: Simpson **KR-KG-14** Potential Lead: CDFG Others: Yurok Tribe, CCC, Landowners **KR-KG-15** Potential Lead: CDFG Others: Yurok Tribe, RNP, NOAA Fisheries **KR-KG-19** Potential Lead: CDFG Others: Simpson, Yurok Tribe, CalTrans	
547	Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and Sonoma County Water Agency Walnut Creek	The Implementation Schedule seems somewhat vague in terms of how specific recommendations would be implemented and who would implement them. How do we decide what actions should be undertaken first. The classification of E critical to recovery and D directly contribute to recovery are useful, but more refinement would be helpful to clearly lay a course for all action entities to follow. The implementation plan and schedule should provide a mechanism to help keep everyone's efforts on track and focused on the highest priority actions.	The commenter is invited to work with the Department and recovery teams in the ensuing years to revisit and potentially re-prioritize actions at a finer scale and to provide better guidance for implementation.
548	Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and Sonoma County Water Agency Walnut Creek	The initial level of prioritization although largely subjective, seems reasonable and the Recovery strategy acknowledges the brief time allotted to CRT members and limited amount of information available for many watersheds and the uncertainty surrounding the coho populations. However, the "Task Levels" assigned in suggest that a	Both priorities and task levels in the Recovery Strategy were developed and reviewed by the Department and recovery teams. Priorities and task levels were based on the best available information. Designations of E, D, and C do not portray priority; all actions and tasks identified were deemed necessary for coho salmon recovery. The differentiation is based on immediacy and/or link to other tasks. The

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		more through understanding is needed of limiting factors for coho populations and what actions will work in concert across the landscape to recover them. This level of understanding is not feasible given the state of current information and assigning tasks a level "E" indicates that it would be feasible. A few examples that highlight this discrepancy between available information and task priority are as follows: - **Page 9-111, Task RR-MS-1.** Managing summer flows in the mainstem to benefit rearing coho in the estuary is ranked "E" as a critical issue for coho recovery. There is no evidence to suggest that the estuary is limiting coho populations in the Russian. - **Page 9-112, Task RR-MS-04.** Evaluating the feasibility of bypassing large dams is rated an "E" priority. Coho populations are depressed in every unregulated stream and river without dams throughout the ESU. In the Russian River coho salmon utilize tributaries for spawning and rearing. The quantity of potential suitable habitat for coho salmon above Coyote and Warm Springs Dams does not seem to warrant an "E" rating for this Task. - **Page 9-112, Task RR-MS-06**. This task assigns an "E" priority to restoring upper mainstem habitat in the Russian River. As noted above, in the Russian River coho salmon utilize tributaries for spawning and rearing. This recommendation should be changed to focus on suitable tributaries in the upper Russian River instead of the mainstem. - **Page 9-113, Task RR-GU-03**. This task identifies stocking lower river tributaries with progeny from the coho broodstock program and receives a "C" priority	commenter is invited to work with the Department and recovery teams in the ensuing years as the Recovery Strategy is implemented to revisit, and potential re-prioritize, these 4 tasks.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		in a high (level 5) priority HSA while stocking streams in the Austin Creek watershed (Task RR-AC-03) gets an "E" in a level 2 HSA. These designations seem inconsistent. We believe that stocking coho in the Guerneville HSA should receive an "E" level rating.	
549	Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and Sonoma County Water Agency Walnut Creek	The Strategy would be greatly improved if it was able to provide more specific guidelines on the amount of habitat needed within basins to promote the successful recovery of coho salmon. The plan identified priority HUs, but to implement the recommendations in the Recovery Strategy, guidelines on how to identify priority streams will need to be established. This prioritization scheme should be based on fundamental ecological principles with considerations given to economic, institutional, and legal factors affecting the implementation and continuation of recovery actions. The number of stream miles required for coho salmon persistence was examined for a number of watersheds in a report funded by, the Water Agency. The report entitled "Estimating the amount of freshwater habitat required for the recovery of coho salmon within watersheds: a habitat based lifecycle (HBL) model" provided estimates on the amount of suitable habitat needed for recovery given observed variations in ocean survival and in the frequency and severity of droughts. One of the fundamental results of the HBL model is that coho metapopulation viability can be maintained within a subset of streams within a watershed. This has important implications not only for how to prioritize recovery actions, but also for how much money should be spent within a watershed to maximize the chance for recovery. Using the model to estimate the areas that are important to protect and those areas needing restoration	The Department considered the HBL in determining preliminary targets in Chapter 4. With improved information over time, the HBL and other analyses likely will further aid coho salmon recovery. Preliminary priority streams are identified in Appendix D.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		provides a more defined target for recovery actions. These data can be used in conjunction with the economic analyses to further refine realistic opportunities for recovery. [Commenter included 3 additional pages outlining application of the HBL.]	
550	Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway	There needs to be adequate opportunity for watershed groups to break out the recommendations and guidance that apply to their areas, and to in turn refine their watershed planning documents to incorporate, emphasize, prioritize and refine their plans for implementation.	Comment noted.
551	Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway	The CSRS could be a better guidance document if there were more prioritization of watersheds, activities in watersheds, and refugia identified. Work to prioritize actions, in collaboration with agencies and watershed groups, should be done as soon as possible, along a realistic timeline.	Comment noted.
552	Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway	Maximum adherence to the plan must be encouraged, and in deed enforced, if not voluntarily implemented and embraced.	The Department and recovery teams believe successful recovery will require voluntary, as well as enforcement and regulatory, actions (see Chapter 5).
553	Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway	There is still resistance to placement of adequate streamside buffers and riparian setbacks, then regulation should enforce the recommendations! A high priority (E) is to “inventory and evaluate the adequacy of buffer zones…” (p.9-13, RW XXII-A-05), but it’s much better to say “Install” or “implement placement of buffer zones. Inventory is fine, but to what outcome? There should be desired outcomes tied to the Tasks.	XXII-A-5 describes evaluation, while XXII-A-06 and -06b describe developing and implementing actions.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
554	Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway	There should be real-calendar timelines associated with tasks as soon as possible. What specifically does "rapidly or early in the coho recovery process" mean? These will likely vary, but along with outcomes, a timing target would be helpful. Estimated duration is good, but what's the start date and target for completion?	Interim tasks are defined as tasks that can commence now or within 5 years without further statute or regulation. Duration of tasks will be determined as tasks are implemented.
555	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	The Recovery Strategy lacks the specificity needed for implementation. It would be helpful if the document stated clearly what next steps are proposed to move this strategy from the general to the specific. The following observations are intended to suggest areas where specificity would be of particular benefit. First, while the Recovery Strategy describes in general terms what might be done or should be done, in most cases it does not call out specific responsibilities, or identify how implementation will be achieved. The recommendations are overly broad and often lack specificity for reasonable expectation of implementation. Programs are alluded to, but not spelled out. Reference is made to "others" and "other agencies," instead of directly referring to them. The recommendations repeatedly refer to "Identify and implement actions to…." In our view, the Recovery Strategy should actually identify those actions more specifically and provide or at least propose a framework to implement those actions. Both the range-wide and Shasta Scott presentations would benefit from charts or displays to show linkages and their relative importance and interdependence.	Comments noted. We agree this is a desirable goal. The SSRT is currently in the process of entering tasks associated with the Shasta-Scott Pilot Program into a project management program which will display linkages between tasks and their implementation sequences.
556	Ms. Catherine Kuhlman Executive Officer North Coast RWCB	Coordination will be essential to recovery, and is often overlooked until absolutely necessary. Some presentation to show the authorities and jurisdictions	The Department is committed to cooperation and coordination and concurs that both actions are essential for recovery (see Chapter 5 and

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Santa Rosa	(and their overlap) would assist the reader, and a firm commitment, or at least a recommendation, would hold the agencies to actually coordinating their actions. We understand this is a major issue for landowners, and one that traditionally is not well addressed by agencies.	implementation tables). However, the Recovery Strategy's recommendations and tasks have no statutory or regulatory authority, and participation is voluntary.
557	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	The times for implementation are not well-defined. There appears to be a sequential nature to the listing (and thus perhaps implementation) of the tasks that may not be intended. This may result in continuation of practices that are detrimental to the recovery while waiting for other actions to occur. Task RW I-C-01: "Plan water supply development and growth that are not harmful to coho salmon habitat" is listed as a task level "C," meaning that it comes after task levels "E" and "D." As such, it is not considered crucial or directly related to recovery, and comes after task RW I-B-01b: "Design passive diversion devices for water diversions," an "E" level task. As a practical matter, water supply development and growth can occur that are harmful to coho salmon habitat in the interim. This should be upgraded to "E," since it is a direct effect, is occurring, and is independent of the RW I-B-01b task above it. Also, in the Gualala River HSA, a number of tasks that are currently being funded by the Department and other agencies, like SWRCB/USEPA, are listed as "C" (e.g., MC-GU-04: riparian zone improvements and MC-GU-05: LWD additions). This implies that the timing is not correct, and that those functions should not be funded in lieu of addressing the "E" tasks.	Task priorities are not necessarily sequential. C tasks are not sequential to D. In some cases, E tasks are ranked as such because their implementation is necessary before other D or C tasks to can occur. In the example of RW-I-C-01, the Department and CRT deemed that C was the appropriate task level. The commenter can work with the Department and recovery team in the ensuing years to re-evaluate this task. With regard to funding, there is no implicit or explicit obligation to fund one task level over another.
558	Ms. Catherine Kuhlman Executive Officer North Coast RWCB	Table 9-1, Enforcement of Existing Laws FPRs contain provisions that should be identified as	The Department already currently evaluates all timber harvests plans within the range of coho salmon with these and other sections of the FPRs in mind.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Santa Rosa	relevant and important for coho recovery. The provisions should be invoked for all timber harvest proposed within the historic range of coho unless the applicant can demonstrate to the satisfaction of CDFG that these provisions should not apply. If it is the view of CDFG that implementing these provisions constitutes a critical element for coho recovery, then this document should state this position. Failure of a THP or NTMP to address critical elements for coho protection and recovery should result in consideration of denial of the plan. [The commenter listed several sections and their wording. Only the sections are listed here.] - 14 CCR 916.4(b) [936.4(b), 956.4(b)]. - 14 CCR 916.4(a) - 14 CCR 916.9 (6) - 14 CCR § 916.9(g), 14 CCR § 936.9(g), or 14 CCR § 956.9(g): (A), (B), (C), and (D) - 14 CCR 916.2 [936.2, 956.2](a) - 14 CCR 916.2(b)	Additionally, RPFs and staff from CDF are acutely aware of protection for coho salmon and other anadromous salmonids and bear this in mind when developing and reviewing timber harvest plans, respectively.
559	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	The council recommends that the Department expand their incorporation of information and direction that is provided in several comprehensive plans for restoring anadromous fisheries either completed or underway in the Lower Klamath Basin and the Trinity River Basin.	The Department intends to use all available information in the implementation of the Recovery Strategy.
560	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	SA-HA-01b: Reduce sediment by accelerating the Northwest Forest Plan and the Five County road assessment schedules on all federal, county and private roads. Others: Landowners Delete this since it's redundant with SA-HA-01b SA-HA-01c: ~~Reduce sediment where roads affect streams inhabited by coho salmon by completing the~~	Comment not incorporated into final document to maintain separation of authorities.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		~~road sediment inventory assessment of County roads.~~	
561	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	SA-HA-01: Reduce sediment and providing coho salmon passage for all life history stages where roads affect streams inhabited by coho salmon. Implement recommendations for federal, county and private roads already assessed. Potential Lead: Road Management and Fisheries Barrier Work Group Task Force Others: Landowners	Comment not incorporated into final document to maintain separation of authorities. The Recovery Strategy has been amended to address the comment: Potential Lead: Road Management and Fisheries Barrier Work Group Task Force, USFS Others: Landowners, County, CDFG
562	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	Delete this since it's redundant with SA-HA-01. ~~SA-HA-01d: Reduce sediment where roads affect streams inhabited by coho salmon by implementing the treatment of the road sediment inventory of county roads.~~	Comment not incorporated into final document to maintain separation of authorities.
563	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	In SA-HA-01e add "Road Management and Fisheries Barrier Work Group Task Force" to Potential Lead, and "Landowners" to Others.	The Recovery Strategy has been amended to address the comment.
564	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	SA-HA-03: Support efforts to educate landowners through the Salmon River Restoration Council's Programs to reduce the impacts of private roads on coho salmon. Potential Lead: Road Management and Fisheries Barrier Work Group Task Force Interim/Ongoing	The Recovery Strategy has been amended to address the comment.
565	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	SA-HA-04: ~~Support~~ Foster the on-going efforts of Salmon River Restoration Council and their Cooperators to deal with invasive exotics using Integrated Pest Management, emphasizing manual treatments. Potential Lead: Salmon River Noxious Weed Management Area Groups Others: Landowners, academia, native plant advocacy	The Recovery Strategy has been amended to address the comment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		groups Delete this since it's covered in SA-HA-04 ~~SA-HA-04b: Request the USFS support the on-going efforts of Salmon River Restoration Council to manually remove invasive exotics as part of Integrated Pest Management program.~~	
566	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	SA-HA-06: add "Salmon River Fire Safe Council" to Potential Lead	The Recovery Strategy has been amended to address the comment.
567	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	SA-HA-05: Reduce the risk of large, severe fires through fuels management around residential structures, ~~and~~ homes, and emergency escape routes. Implement Salmon River Fire Safe Council recommendations promoting the reduction of fuel near residences to reduce human-caused fires spreading into the forest and causing harm to coho salmon habitat. Potential Lead: Salmon River Fire Safe Council	The Recovery Strategy has been amended to address the comment.
568	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	SA-HA-06b: If necessary, integrate coho salmon conservation into the Northwest Forest Plan, National Fire Plan, Klamath National Forest Fire Plan, Salmon River Restoration Strategy, regarding fire suppression and overall fuel management plan. Promote the development of the Salmon River Subbasin Fire and Fuels Management Plan to address private, public and tribal lands. Potential Lead: Salmon River Fire Safe Council SA-HA-11: Establish a multi-agency task force to help advise the Forest Service to develop the implementation program for forest management, focusing on green tree, salvage, sanitation, hazard tree, roadside logging to insure forest health in accordance with the Northwest Forest Plan. This task force would include at a	The Department can work with the commenter in the ensuing years to evaluate these recommendations.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		minimum, representatives from Salmon River Restoration Council, Karuk Tribe, USFS, NOAA Fisheries, County, USFWS, CDFG, and CDF. Potential Lead: Salmon River Forestry Roundtable Others: Landowners, Timber Interim/Ongoing SA-HA-12: Develop and implement a plan to restore the Wooley Creek watershed, including completing prioritized road restoration, fire and fuels management, noxious weeds, and fisheries barriers. Potential Lead: Klamath-Salmon Learning and Understanding Group.	
569	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	SA-HA-08: add to the Others list: Klamath Basin Fisheries Restoration Task Force, North Coast Regional Water Quality Control Board, California Agricultural Department, academia, various funding sources. Add Ongoing to the estimated duration column	The Recovery Strategy has been amended to address the comment.
570	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	SA-HA-09: Supplement on-going efforts to provide short-term and long-term benefits to coho salmon by restoring LWD and shade primarily in tributaries and key refugia areas in the Salmon River ~~through~~: a. LWD placement; b. Management to promote conifer recruitment; c. Improvement of existing riparian zones through plantings, release of conifers, and control of alders, blackberries, and other competitors; and d. Incentives to landowners, such as technical support. Potential Lead: USFS, CDFG Others: NOAA Fisheries, Watershed Groups, County, USFWS, Karuk Tribe, Salmon River Restoration Council, Landowners, ~~CDFG.~~	The Recovery Strategy has been amended to address the comment.
571	Mr. Peter Brucker Salmon River Restoration Council	SA-HA-10: Develop a plan to remediate mine tailings in prioritized areas.	SA-HA-10 replaced with: Develop a plan to prioritize and remediate mine tailings.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Sawyers Bar	Potential Leads: CDFG, CGS, North Coast Water Quality Control Board, USFS OTHERS: ~~USFS~~, NOAA Fisheries, ~~CGS~~, Karuk Tribe, USFWS, Salmon River Restoration Council, Landowners	The Recovery Strategy has been amended to address the comment.
572	Mr. Peter Brucker Salmon River Restoration Council Sawyers Bar	SA-HA-10b: Implement the plan to remediate prioritized mine tailings , focusing on tributaries and key areas of the Salmon River. POTENTIAL LEAD: CGS, USFS, North Coast Water Quality Control Board OTHERS: ~~USFS~~, NOAA Fisheries, CDFG, USFWS, Karuk Tribe, Salmon River Restoration Council.	The Recovery Strategy has been amended to address the comment.
573	Ms. Catherine Kuhlman Executive Officer North Coast RWCB Santa Rosa	NCRWQCB staff would like to coordinate TMDL planning and implementation efforts with coho recovery efforts.	The Department intends to work with both public and private entities as stated in the Recovery Strategy, to achieve coho salmon recovery.
574	Mr. John Ricker County of Santa Cruz	p. 9-132+: Under Recommendations BB-HU-05, BB-HU-07, BB-HU-07b, BB-DA-03, BB-DA-04, BB-SL-01, BB-AP-01, and BB-AP-02, add Santa Cruz County Resource Conservation District and the California Coastal Conservancy as implementing agencies.	For recommendations BB-HU-05, BB-HU-07, BB-HU-07b, BB-DA-03, BB-DA-04, BB-SL-01, BB-AP-01, and BB-AP-02, under "Identified Action Entities, Others": Added "Santa Cruz County Resource Conservation District" and "Coastal Conservancy".
575	Mr. John Ricker County of Santa Cruz	P. 9-132+: under Recommendations BB-HU-04, BB-HU-06, BB-HU-07, BB-DA-07, BB-DA-07b, BB-DA-07c, and BB-AP-02, change RWQCB to SWRCB (the RWQCB is not involved in streamflow maintenance or water rights)	In recommendations BB-HU-04, BB-HU-06, BB-HU-07, BB-DA-07, BB-DA-07b, BB-DA-07c, and BB-AP-02 under "Identified Action Entities": Changed RWQCB to SWQCB.
576	Mr. John Ricker County of Santa Cruz	p. 9-134: Increase the Task Level of BB-SL-01 to "E", as sediment has been identified as one of the key limiting factors for coho in the San Lorenzo River Salmonid Enhancement Plan.	Task level remains at C as per recommendation of Department biologist.
577	Mr. John Ricker County of Santa Cruz	The wording of Recommendation BB-SL-04b is unclear as there are many recommendations within the San Lorenzo River Salmonid Enhancement Plan that should	Task level remains at C as per recommendation of Department biologist.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		probably be at a Task Level "E", similar to those in the Soquel Enhancement Project Plan (Recommendation BB-AP-01).	
578	Mr. John Ricker County of Santa Cruz	In recommendation B-AP-01 change the reference to the Soquel Creek Watershed Restoration Plan to the Soquel Creek Watershed Assessment and Enhancement Project Plan (2003), which is the correct name for the referenced document.	Recommendation BB-AP-01: Changed "Soquel Creek Watershed Restoration Plan" to "Soquel Creek Watershed Assessment and Enhancement Project Plan (2003)".
579	Mr. John Ricker County of Santa Cruz	Add "conjunctive water management for recovery of groundwater levels" as an element under recommendation BB-AP-02.	Recommendation BB-AP-02 changed to: "Maintain year-round …, stream gauging, self-monitoring of diversions, and conjunctive water management for recovery of groundwater levels."
580	Mr. John Ricker County of Santa Cruz	A recommendation (BB-AP-03) should be added to: "Implement elements of the Aptos Creek Watershed Assessment and Enhancement Plan that are consistent with the coho salmon recovery strategy."	The commenter is invited to work with the Department and recovery teams in the ensuing years to evaluate and integrate, if appropriate, elements of the Aptos Creek Watershed Assessment and Enhancement Plan into the coho salmon recovery strategy.
581	Mr. John Ricker County of Santa Cruz	P. 9-3 Section 9.5, Implementation Schedule. Change section number 9-5 to 9.6.	The Recovery Strategy has been amended to address the comment.
582	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 9-33, Table 9-2, KR-HU-03: PacifiCorp controls water releases from the Klamath Hydroelectric Project and should be included as an action entity.	We believe this comment is directed to Task number KR-HU-01. PacifiCorp is the operator of Iron Gate Dam, but minimum flow release schedules are the responsibility (and under the control) of the USBR per the 2002 BO for coho salmon. PacifiCorp is added to the list of action entities.
583	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 9-33, Table 9-2, KR-HU-04: Reclamation should not be the lead for this effort, since Reclamation does not own, operate or otherwise have jurisdiction over operation of Klamath Hydroelectric Project dams. PacifiCorp should instead be designated as the lead entity because it is already evaluating fish passage improvements at these facilities in the FERC re-licensing	The USBR owns Link River Dam, the major diverter of Klamath River water to the Klamath Project, and under certain circumstances (extremely low upper Klamath Lake water elevations) assumes control of dam operations. The potential lead entities for Task number KR-HU-04 have been revised to include PacifiCorp and FERC and include the USBR as a cooperator.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		process.	
584	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 9-33, Table 9-2, KR-HU-08: The BIA and USFWS should be listed as the lead agencies for this task. Reclamation was not the primary agency funding or directing flow study activities on the mainstem Klamath River (e.g. Hardy Phase II).	The Recovery Strategy has been amended to address this comment. The BIA and the USFWS are identified as lead entities for this task. USBR is removed as lead.
585	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 9-33, Table 9-2, KR-HU-08b: Reclamation does not control flow releases from the Klamath Hydroelectric Project and therefore should not be listed as the lead agency for this task. Implementing the flow study should involve the BOR, USFWS, NOAA, CDFG, and also include PacifiCorp and others.	The Department believes that implementing flows that will restore natural stream processes will require the participation of all entities currently managing water on the Klamath River. Flow releases by PacifiCorp at Iron Gate Dam are constrained by upstream releases from the Klamath Project. We therefore believe that USBR is still the logical lead entity for this task.
586	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	9-33, Table 9-2, KR-HU-09: PacifiCorp should be listed as the action entity for this task since they shape flows below IGD for power production purposes. Reclamation should not be listed as the "lead" entity, since Reclamation does not own, operate or otherwise have jurisdiction over operation of Klamath Hydroelectric Project dams. Reclamation should be a participating agency, as we are already applying protective down-ramp rates at IGD to minimize stranding of fry.	Deleterious effects of downramping at Iron Gate Dam occur from both Klamath Project and PacifiCorp operations. PacifiCorp and FERC are added as potential lead action entities for this task.
587	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 9-33, Table 9-2, KR-HU-11: FERC and PacifiCorp should be listed as the lead agencies for this task. Reclamation should not be listed as the "lead" entity, since Reclamation does not own, operate or otherwise have jurisdiction over operation of Klamath Hydroelectric Project dams.	The Recovery Strategy has been amended to address the comment. PacifiCorp and FERC are identified as potential lead action entities for this task. USBR should participate as a cooperator because of the interrelationship of the Klamath Project and hydroelectric operations and facilities.
588	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 9-33, Table 9-2, Task KR-HU-19: PacifiCorp should be listed as the lead agency for this task. Reclamation should not be listed as the "lead" entity, since Reclamation does not own, operate or otherwise have jurisdiction over operation of Klamath Hydroelectric	The Recovery Strategy has been amended to address the comment. PacifiCorp is identified as the potential lead action entity for this task.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		Project dams.	
589	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 9-33, Table 9-2, Task KR-HU-20: PacifiCorp should be listed as the lead agency for this task. Reclamation should not be listed as the "lead" entity, since Reclamation does not own, operate or otherwise have jurisdiction over operation of Klamath Hydroelectric Project dams.	The Recovery Strategy has been amended to address the comment. PacifiCorp and FERC are identified as potential lead action entities for this task. USBR is removed from this role.
		10: SHASTA-SCOTT PILOT PROGRAM	
590	Mr. Felice Pace Klamath Forest Alliance Klamath Glen	Interconnected groundwater is not adequately addressed. Information from DWR shows groundwater pumping is directly related to decreasing channel flow. The must be a pause in new groundwater pumping wells now. We cannot wait for studies. Make it clear in the Strategy that Siskiyou County must adequately address groundwater issues in the Shasta and Scott before programmatic take permits will be issued in these watersheds.	The Scott River decree (Decree No. 30662) recognizes the role of interconnected groundwater in maintaining surface flows in the Scott River, and therefore includes groundwater pumping within the interconnected zone in the adjudication. However, the extent of the interconnected zone is not precisely known. Nor do we know the location of critical recharge zones. To better understand the relationship between groundwater pumping and surface flows, Task Number WM-10b (page 10-12) recommends a comprehensive study to determine the current status of groundwater in the Scott Valley. This effort will also provide useful information to support the development of a groundwater management plan by the County. The Department issues incidental take permits in accordance with the issuance criteria found in FGC § 2081(b) and Title 14, § 783.4. Specifically, the project must be an otherwise lawful activity (i.e. in compliance with existing laws, codes and statutes) and the impacts of the taking must be minimized and fully mitigated.
591	Mr. Felice Pace Klamath Forest Alliance Klamath Glen	Failure to address groundwater pumping in the Shasta-Scott will result in extinction.	The Department issues incidental take permits in accordance with the issuance criteria found in FGC § 2081(b) and Title 14, § 783.4. Specifically, the project must be an otherwise lawful activity (i.e. in compliance

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			with existing laws, codes and statutes) and the impacts of the taking must be minimized and fully mitigated.
592	Mr. Jeff Fowle Siskiyou County Farm Bureau Etna	Would like too commend the Shasta-Scott effort. I am encouraged by the Pilot Program.	Comment noted.
593	Mr. Jeff Fowle Siskiyou County Farm Bureau Etna	Many of the high and medium priority sites in the Scott Valley have been completed or will be shortly. We are nearing the point where we'll see if restoration actions will produce more coho. However, there are two things we cannot control: geomorphology and weather.	The Shasta-Scott Pilot Program was initiated in part because of the extensive restoration efforts that have been implemented over the past decade. In order to determine whether these and other restoration actions are increasing the production of juvenile coho salmon, it will be necessary to develop and implement effective programs to monitor juvenile and adult coho salmon populations on private lands in both valleys.
594	Mr. Jeff Fowle Siskiyou County Farm Bureau Etna	Recent studies by DWR have shown that even without irrigation diversions, many Scott River tributaries will lose connectivity in average and below-average years. Water storage projects need to be implemented.	Our discussions with DWR staff suggest that some tributaries can be expected to lose connectivity with the mainstem Scott in the absence of irrigation diversions. It is important to maintain connectivity as long as possible into the summer months to allow juvenile coho salmon access to dependable cold water rearing habitat in these tributaries. Water storage projects may be one way of augmenting flows in tributaries that provide important rearing habitat for coho salmon. The Shasta-Scott Pilot Program includes a variety of water augmentation recommendations. These include evaluation of both small- and large-scale storage opportunities, conjunctive ground water use, water storage within the Scott Valley dredger tailings and acquiring water rights from willing sellers.
595	Mr. Mark Dean Chamber of Commerce Manager Yreka	How will this plan affect Greenhorn Reservoir? The City of Yreka, the Yreka Chamber of Commerce and the Ford Family Foundation would be greatly concerned about	No plans for the removal of Greenhorn or Dwinnell dams have been adopted. Task Number Shasta HM-2b (page 10-29) recommends the development of a

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Mr. Terry O'Neill Yreka	any recommendation to remove Greenhorn Dam and its reservoir.	long term strategy for improving fish passage at Greenhorn and Dwinnell dams. This study could include an assessment of suitable habitat upstream from the reservoirs, options for fish passage, or modification/removal of the dams. Any proposal to remove either of these dams would require extensive feasibility and environmental analyses before being adopted.
596	Mr. Scott Murphy Siskiyou County Farm Bureau Etna	Agriculture is the fifth largest industry in California. Agriculture and Timber are the backbone of the local economy. I am concerned that the Recovery Strategy will drop our agricultural productivity.	Table F-21 (Economic cost and impact of implementation of the Shasta and Scott River Pilot Program) (Appendix F, page 60) identifies $155,172,987 in positive socieconomic impacts associated with implementation of coho salmon recovery in the Pilot Project area. A benefits analysis was not conducted. However, specific recommendations designed to address water management, augmentation, and use efficiency should go a long ways to minimize any impacts on local agricultural productivity. The Department believes that it will be possible to recover coho salmon and maintain a healthy agricultural community in the Scott and Shasta Valleys.
597	Mr. Aaron Peters Chairman Quartz Valley Indian Reservation Fort Jones	The problem of lack of adequate flows is repeatedly stated. We would like to see those flows increased by next year to reduce impacts to coho prior to flow studies being completed.	The DWR Watermaster, in conjunction with the Department , Siskiyou Resource Conservation District and individual water diverters, will strive to increase water flows as outlined in the Water Management Recommendations contained in the Shasta-Scott Pilot Program (pages 10-4 to 10-14).
598	Mr. Aaron Peters Chairman Quartz Valley Indian Reservation Fort Jones	The Recovery Strategy suggests supplementing water in Shasta Valley with water from the Klamath River. In September of 2002 there was a disastrous fish kill in the Klamath, caused in part by insufficient water. Tribal people were adversely affected culturally and economically. The Klamath needs more water, not less.	The Department agrees that the Klamath River needs more water, not less. However, there would be no net loss of Klamath River water under the current proposal as warmer water diverted from the Klamath River into the Shasta Valley for irrigation would be replaced downstream by an equal amount of cooler water made

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			available from the Shasta River.
599	Mr. Aaron Peters Chairman Quartz Valley Indian Reservation Fort Jones	An option posed by the SSRT involves increasing the after level in Cliff Lake and other small mountain lakes. Would the 150 acre foot increase in water storage provide Shackleford Creek enough water to run above ground through the summer and fall? Doubtful. Cliff Lake feeds Shackleford Creek, which runs through our Reservation, and could affect water on or near the Reservation; therefore, we would like more information and to be involved in any implementation.	Comment noted.
600	Mr. Ben Riggan Orleans	Ensure adequate flows from the Scott and Shasta Rivers. The Klamath River is a difficult enough place for fish to survive as it is.	Current information to determine adequate flows in the Scott and Shasta rivers is lacking. Task Number WM-9 contains recommendations for conducting instream flow studies on both river systems to provide a sound basis for determining adequate flows for coho salmon.
601	Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County Yreka	*Page 10-13 Basin groundwater management plans "protecting the resource for all users, including fish."* The right to use groundwater is currently owned by the overlying landowners, not other users or fish. I am concerned that this recommendation does not reflect that fact and appears to recognize an expanded ownership interest.	The right to use groundwater is limited to use on the overlying land and is held by the overlying landowner. This recommendation assumes this fact and is not intended to reflect any expanded ownership interest.
602	Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County Yreka	*Page 10-18 Conjunctive use* – I am concerned with the legal ramifications of using public or other funds to store surface water commingled with groundwater. Currently, the rights to use groundwater belong to overlying land owners. Storage through conjunctive use muddies the private ownership rights of use to that water and would likely result in a loss or diminishment of rights to the overlying owner.	The right to use groundwater is limited to use on the overlying land and is held by the overlying landowner. Storage issues relative to overlying landowner rights will depend upon where the water is stored, accounting methods, and cooperation of the overlying landowner(s).
603	Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County	*Page 10-48 Recommendations that the County develop agricultural land use policies addressing coho recovery actions, ideas and protection.* The recovery strategy	The Recovery Strategy is intended to contain an equitable apportionment of both public and private and regulatory and non-regulatory obligations to achieve

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Yreka	reaches to achieve a standard beyond the regulatory prohibitions on "take" of coho. As such, it is intended to achieve its goals through voluntary participation and positive, incentive-based approaches. It is inappropriate to recommend that the County utilize its regulatory police powers (zoning and other ordinances), to implement "protections" and enforce the recovery strategy through "agricultural land use policies" affecting the private property of landowners. It should be noted that the County has voluntarily implemented recovery strategies through its road department, and will continue to do so on a non-regulatory basis.	recovery. These include voluntary incentives and regulatory requirements. The Department cannot require Siskiyou County to use its regulatory police powers to recover coho salmon. However, we do encourage the County and other local governments to consider developing land use policies that are consistent with protection of the aquatic and riparian resources upon which coho salmon depend. The Department appreciates the voluntary efforts the County has made in this area.
604	Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County Yreka	*Page 10-55 Promoting the use of permanent riparian conservation easement.* Both the Shasta and the Scott are non-navigable streams, with adjacent ownership extending to the streambed and banks. Although riparian water use rights have been adjudicated on the Scott, they have not been on the Shasta. The creation and sale of riparian conservation easements could complicate public access and water use rights issues that are already complicated. The use of public funds and the standard Third Party Suit provisions in conservation easements can create standing for out of area stakeholders to further complicate issues and force private landowners into management that could negatively impact their agricultural operations. A conservation easement is forever and can eliminate the possibility of adaptive management. The Conservation Reserve Program (CRP) riparian lease program currently offered by U.S.D.A. Farm Service Agency http://www.fsa.usda.gov/dafp/cepd/crpinfo.htm is an approach superior to permanent conservation easements and does not have the accompanying permanent complications.	The Department believes that it will be necessary to use a variety of conservation tools to recover coho salmon. We support the Conservation Reserve Program as one means of protecting important riparian habitats within the range of coho salmon. However, we believe that traditional conservation easements purchased from willing sellers may also be an important tool in this effort.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
605	Mr. Don Meamber Montague	The State Dept. of Water Resources has their concrete weir on the Shasta River on my cattle ranch. I assisted the Water Master with this project of constructing the dam many years ago. Now times have changed and water temperature has been flagged for TMDL by the Water Quality Control Board. The USGS took over managing the weir a couple years ago. Their people have told me that the dam is not necessary for them to measure and record the flow. It seems only proper that the State would remove their own dam that is no longer needed, stymies fish passage and backs up the River more than 1,000 ft., collecting heat. This would set a good example for the private landowners that might wish to improve or remove their own irrigation structures. If the weir is removed, the River should narrow and deepen on my property and the riparian cover should crowd and shade the stream more naturally.	Options for modification for this low head weir are being considered by Department staff in the area. Since the need for reliable flow information has been highlighted in the coho salmon recovery strategy and specifically in the Shasta Scott Pilot Project, flow gauging structures maintain their utility. As a concrete structure of about 1 foot height, the weir can be a barrier to juvenile coho salmon movement during very low flow. The goal for modification of the structure would be to reduce any deleterious effects on juvenile fish passage under low flow conditions and avoid increased water temperature while maintaining the utility of the control structure for flow gauging. This weir along with other structures will be assessed in the identification and treatment prioritization of barriers to coho salmon passage -Task Number SS-HA-05 from the Recovery Strategy (page 58). Structures that act as barriers to coho salmon passage may be modified (if there are other beneficial uses) or removed as funding becomes available.
606	Mr. Ben Riggan Orleans	Get rid of passage blocks such as Iron Gate Dam. This would help to open up extensive areas for spawning.	Iron Gate Dam currently blocks coho salmon access to approximately 30 river miles of suitable habitat above the reservoir. Task Number KR-HU-04 (page 9-33) recommends the development of a plan for coho salmon passage over and above Iron Gate Dam and Copco Dam to restore access to historic habitat. Task Number KR-HU-20 (page 9-34) proposes restoration of coarse sediment supply and transport near Iron Gate Dam, including consideration of full or partial removal of the Klamath Project.
607	Mr. Glen H. Spain Northwest Regional Director PCFFA and IFR	The Scott/Shasta agricultural water recommendations are too voluntary, and need more deliverables including specific instream water flow targets. Additional timelines for accomplishing these goals, and regulatory	The Department agrees that coho salmon need adequate amounts of cold water flows for spawning and rearing.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		alternatives if the goals are not met after a certain time, should also be included. Incidental take permits should not be given based on promises of future actions because those promises are inherently speculative. Current jeopardy cannot be avoided by speculative future actions. The emphasis in the Scott and Shasta in particular should be on putting more water back into the river and maintaining cold water flows of sufficient volume throughout the summer to fully support coho spawning and rearing. Without dedicating those flows, all other recovery measures are likely to be moot. There should be a stronger emphasis on enforcement mechanisms to make sure there are adequate instream flows.	
608	Mr. Dave Hillemeier Fisheries Program Manager Yurok Tribe	As we have expressed throughout the recovery planning process, an issue of utmost importance in the Shasta and Scott Rivers is that of interconnected groundwater. There is an obvious connection between groundwater pumping and surface flows in these systems, especially in the Scott River. The recovery strategy should include a recommendation to implement a pause in groundwater development in critical recharge zones until additional studies can be completed and a groundwater management plan developed by Siskiyou County.	The Scott River decree (Decree No. 30662) recognizes the role of interconnected groundwater in maintaining surface flows in the Scott River, and therefore includes groundwater pumping within the interconnected zone in the adjudication. However, the extent of the interconnected zone is not precisely known. Nor do we know the location of critical recharge zones To better understand the relationship between groundwater pumping and surface flows, Task Number WM-10b (page 10-12) recommends a comprehensive study to determine the current status of groundwater in the Scott Valley. Without better information in this area, the Department believes that a pause or moratorium on groundwater wells is premature. This effort will also provide useful information to support the development of a groundwater management plan by the County.
609	Ms. Chrissie Ishida	I am a little confused that there isn't the same level of	The difference in level of scrutiny and coverage

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Copco Lake	commitment in areas where there are more resources, both financially and by sheer numbers of people. From what I gathered the plan is wide range and yet Siskiyou County seems to be bearing the burden for all of Northern California.	between the Shasta/Scott sub-watersheds and the rest of the state is not due to any reduced level of commitment on the part of individuals, organizations or agencies in these other areas. As mentioned in Chapter 10 of the Recovery Strategy, the Commission directed the Department to establish a pilot program to address coho salmon recovery issues associated with agriculture in the Shasta Valley and Scott River recovery units in addition to addressing coho salmon recovery needs within the range of coho salmon in California. The goal of this focused Shasta-Scott effort is to concentrate on one area with a collection of individuals and groups that have demonstrated the commitment and ability to work together to find solutions to big issues such as water allocation to sustain both the needs of humans and natural resources. The pilot program, similar to the rest of the state Recovery Strategy, is a blend of public and private tasks involving both incentives and regulatory actions. All areas within the range of coho salmon in the state are covered by the lists of tasks incorporated in the coho salmon recovery strategy (See Chapter 9 for tasks). These task lists were assembled from recommendations put forth by the two recovery teams representing the spectrum of diverse interests and perspectives of the people living within the range of coho salmon in California.
610	Mr. Dave Hillemeier Fisheries Program Manager Yurok Tribe	For the Shasta and Scott Rivers, include CRT recommendations that were omitted from the Draft Recovery Strategy: <u>Flow Study Related</u> *Utilize an interim methodology (e.g. desktop methodologies based on unimpaired hydrology) to establish minimum flow levels for implementation*	Agricultural water use within the Shasta and Scott river valleys was considered by the SSRT as part of the Shasta-Scott Pilot Program. This recommendation was not included in the Recovery Strategy because the CRT failed to reach consensus on the substance of the recommendation.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		throughout the Shasta and Scott Rivers until a comprehensive flow study can be completed. Methods utilized for the interim flow study should be determined by a technical group of experts from the Klamath Basin, including, but not limited to: CDFG, USFWS, Klamath Basin Tribes, NOAA Fisheries, USGS, and USFS. A recommendation contained in the public draft document regarding flow studies in these basins that differs substantially from the above is WM9: *Short Term: As an interim measure and in coordination with the Emergency water Plan and other recommended water management measures, identify target minimum instream flows for the tributaries that provide coho summer rearing habitat. Seek funding and carry out study. Explore different instream flow assessment methods including, 1D and 2D modeling, microhabitat mapping, hydrologic modeling and others. Use water balance information, including feasibility aspects. Evaluate potential application of BOR Klamath Irrigation Project Conservation Implementation Program. Long Term: Integrate findings into watershed planning process.* A primary difference between these two recommendations is the time involved with "short-term". The "short-term" recommendation contained in the public draft document will take many years (a couple years to "possibly" secure funding, years to conduct studies, years to analyze data and compile results, etc…) and would more appropriately be listed as a "long-term" objective. From the perspective of the Yurok Tribe, whom depends upon the restoration of these ecosystems, the "short-	The Department believes that interim flows are needed to protect coho salmon populations from further losses while instream flow studies are being conducted. Interim flow estimates should be based on the best available information. The Department is concerned that application of broad desktop methods based on estimated unimpaired flows will not provide information that can be directly related to coho salmon habitat and life history needs at the site specific level. The Department issues incidental take permits in accordance with the issuance criteria found in FGC § 2081(b) and Title 14, § 783.4. Specifically, the project must be an otherwise lawful activity (i.e. in compliance with existing laws, codes and statutes) and the impacts of the taking must be minimized and fully mitigated.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		term" means to ensure that adequate water is in these streams next year. Interim estimates regarding the flow necessary to support the ecosystems that coho depend upon should be derived this winter using desktop hydrologic methods based on estimated unimpaired flows. The "long-term" recommendation contained in the public draft document is not a flow study recommendation, but an implementation recommendation. Another notable difference between the two flow study recommendations is that the CRT recommends that the Tribes be included on the group of technical experts that will be charged with determining the flow study methodologies to be followed, while the public draft document fails to mention the Tribes as an "identified action entity" (entities identified include CDFG, NOAA Fisheries, USFWS, USFS, RCDs, CRMP, and SRWC). It is our sincere hope that this exclusion of the Yurok Tribe from participation on this technical team was inadvertent, and not another effort to exclude the Tribe from participating in a process intended to recover the fisheries resource that the Tribe depends upon. As you are aware, a major concern of the Yurok Tribe during the recovery planning process has been that our request to participate on the Shasta-Scott Recovery Team was denied. In effect, we were precluded from participating in this recovery planning process. Many individuals from the Scott and Shasta Rivers have shared our concern that the Tribe should have been included in the process. We strongly recommend that this mistake not be repeated. The final recovery	

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		strategy should identify the Yurok Tribe as an action entity regarding flow study efforts in the Shasta and Scott Rivers. Enforcement of existing law *SS-HA-34: The proposed five year Incidental Take Permit shall clearly cite as conditions, compliance with laws, codes, regulations and ordinances referenced in SS-HA-33.* We see no reason to exclude a recommendation to ensure compliance with existing laws, codes, regulations and ordinances.	
611	Mr. Dave Hillemeier Fisheries Program Manager Yurok Tribe	Groundwater Management Plan As we have expressed throughout the recovery planning process, an issue of utmost importance in the Shasta and Scott Rivers is that of interconnected groundwater. There is an obvious connection between groundwater pumping and surface flows in these systems, especially in the Scott River. The recovery strategy should include a recommendation to implement a pause in groundwater development in critical recharge zones until additional studies can be completed and a groundwater management plan developed by Siskiyou County. In addition, any incidental take permits issued in the Scott and Shasta Valleys should be contingent upon Siskiyou County implementing a scientifically credible groundwater management plan.	The Scott River decree (Decree No. 30662) recognizes the role of interconnected groundwater in maintaining surface flows in the Scott River, and therefore includes groundwater pumping within the interconnected zone in the adjudication. However, the extent of the interconnected zone is not precisely known. Nor do we know the location of critical recharge zones To better understand the relationship between groundwater pumping and surface flows, Task Number WM-10b (page 10-12) recommends a comprehensive study to determine the current status of groundwater in the Scott Valley. Without better information in this area, the Department believes that a pause or moratorium on groundwater wells is premature. This effort will also provide useful information to support the development of a groundwater management plan by the County.
612	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Chapter 10, Table 10-1: This section of the recovery strategy should also cite that Reclamation is undertaking several actions in the Shasta-Scott river valleys as requirements of the NOAA Fisheries Biological Opinion	The Department and the SSRT have recently begun discussions with USBR to explore ways to coordinate implementation of the Reasonable and Prudent Measures required by NOAA Fisheries' Biological

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		on Klamath Project operation. These are Reasonable and Prudent Measures (RPM) to reduce incidental take and include: provide funding for instream flow studies (RPM 5); groundwater investigations (RPM 4); screening/gauging station installation (RPM 6); and to develop a plan to minimize reductions in flow due to early season diversions (RPM 7). By fulfilling these RPM obligations, Reclamation will be able to partially assist in helping accomplish several of the tasks identified in Table 10-1.	Opinion and related recovery tasks identified by the Shasta-Scott River Pilot Program.
613	Mr. Frank Michny Regional Environmental Officer Bureau of Reclamation Sacramento	Page 10-11, task no. WM-9: The phrase which states, "Evaluate potential application of Bureau of Reclamation Klamath Irrigation Project Conservation Implementation Program." does not accurately describe the CIP, which is correctly titled as the Klamath River Conservation Implementation Program. The statement also implies that funding could be available through the CIP for task implementation. The CIP is a basinwide program that would be governed and implemented the stakeholders in the basin. The CIP is not a Reclamation program, although its establishment was originally mandated in the 2002 NOAA Fisheries biological opinion on Klamath Project operations. As such, Reclamation is taking the lead in seeking its establishment and implementation. Reclamation anticipates that short-term and long-term actions undertaken as part of the recovery strategy would need to be coordinated with the CIP. The above-referenced statement is repeated numerous times in this chapter. It should either be deleted or revised to more accurately characterize the relationship between the recovery strategy and the CIP and whether California will participate in the CIP.	Clarification noted. This phrase was actually intended to refer to the Reasonable and Prudent Measures within the Shasta and Scott River valleys required in NOAA Fisheries' 2002 Biological Opinion. The language in Task numbers WM-9, WA-1c, WA-4a, WA-4b, WA-4c, and WA-7b has been changed to read: "Evaluate potential ~~application of Bureau of Reclamation Klamath Irrigation Project Conservation Implementation Program~~ for implementation in conjunction with applicable Reasonable and Prudent Measures required in NOAA Fisheries' Biological Opinion for the Klamath Project."
614	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB	Page 10-2 refers to development of a programmatic implementation framework covering, among other things, unavoidable incidental take of coho salmon. We	The Department has been in discussions with the Shasta Valley RCD and the Siskiyou RCD regarding an incidental take permit application for water

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Santa Rosa	understand the SSRC is developing a general permit for incidental take of coho to be held by the Shasta Valley RCD, which would require minimum requirements of land owners for inclusion in a five-year permit. The Recovery Strategy does not provide any details on this permit. NCRWQCB staff requests the opportunity to comment on the details of the permit requirements.	diversions and other activities related to agricultural practices in the Shasta and Scott valleys. A permit application has not been submitted at this time, so details regarding the terms and conditions of the permit have yet to be determined. The Department expects that any incidental take permit issued will be consistent with the Shasta-Scott Pilot Program. Before the Department can issue a permit it must prepare an environmental analysis pursuant to CEQA. We encourage you to submit NCRWQCB comments at that time.
615	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	Table 10-1: Column 1, "Has Priority" should be defined.	The term "HAS Priority" in Table 10-1 should actually read "HSA Priority." This error has been corrected in the final document. As in Table 9, this term refers to relative priorities that have been established for individual Hydrologic Subareas (HSAs) taking into account consistency of coho salmon presence, risk of extinction, restoration potential and disconnected habitats. The prioritization process is described in Section 6.3 (pages 6-87 through 6-105) of the recovery strategy.
616	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	The NCRWQCB should be included as an "identified action entity" in the following Scott and Shasta River tasks: WM-4a, WM-8b, WM-9, WM-10a, WM-10b, WM-10c, WM-11a, WM-11b, Scott HM-1-1c, Scott HM-1-2a, Scott HM-1-2b, Scott HM-1-2d, Scott HM-2a, Scott HM-4a, Scott HM-4b, Shasta HM-1a, Shasta HM-2a, Shasta HM-2c, Shasta HM-2d, Shasta HM-2e, Shasta HM-5b, WUE-7a, WUE-7b, P-2, MA-1a, MA-1b, and EO-2.	The Recovery Strategy has been amended to address the comment. The Regional Board is already listed as an action entity for Task numbers Scott HM-1-2d and Shasta HM-2e.
617	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	Any recommendations that come out of the coho recovery planning process should take into account the TMDL process. For these reasons and others, it is important that CDFG involve Regional Board staff in the process as early as possible.	The Department recognizes the TMDL process that is ongoing in the Shasta and Scott valleys and has been participating in this effort through our representative on the Technical Advisory Group. The Department intends to coordinate with Regional Board staff in the

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			TMDL process and welcome the participation of your staff in the review and implementation of the recovery strategy.
618	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Water Management: Instream Flow Studies and Recommendations (WM-9), Groundwater Studies (WM-10a, WM-10b, WM-10c), and Water Balance Studies (WM-11a, WM-11b).** Instream flow and water balance studies should assess the relationship between flows and water quality conditions, as well as the relationship to physical habitat conditions	The Department recognizes that stream flows influence both the quality and physical availability of habitat for fish.
619	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Water Management: Instream Flows Studies and Recommendations.** The "Issue" does not include low dissolved oxygen concentrations as a factor limiting coho production within the Shasta River. The NCRWQCB's analysis of dissolved oxygen data indicates that dissolved oxygen concentrations are at levels that correspond with "severe production impairment" of all salmonid life stages, according to EPA reports. The NCRWQCB should be identified as an "action entity" since NCRWQCB staff have initiated action to understand and address the effect of low dissolved oxygen concentrations on salmonids in the Shasta River watershed.	Dissolved oxygen concentrations in the Shasta River are an acknowledged problem for coho salmon and other salmonids. Low dissolved oxygen levels are included among the factors limiting coho salmon production in the Shasta Valley HSA description on page 6-23 of the recovery strategy. The Department believes this issue is best addressed under Habitat Management and Restoration: Improvement of Rearing Habitat for Shasta Valley (page 10-27). The issue statement in this section has been amended to read: "Inaccessibility to tributaries, high stream temperatures, low dissolved oxygen levels, and lack of habitat complexity limit coho salmon production within the Shasta River."
620	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Scott HM-1-1c and Shasta HM-4a: Encourage riparian restoration projects using locally native vegetation.** This recommendation focuses on riparian restoration projects, which are likely to be of key importance in temperature TMDL implementation strategies in the Scott and Shasta Rivers.	Comment noted.
621	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Water Use Efficiency: Tailwater Reclamation. WUE-7b** "…Provide an agricultural waiver to eliminate red tape and permitting hurdles that currently block construction of tailwater systems." Not all tailwater	The Department looks forward to working with NCRWQCB staff in expediting the development of effective tailwater capture systems.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		reclamation systems require a NPDES permit. NCRWQCB staff would like to work with CDFG and interested parties to discuss permitting requirements for construction of tailwater systems.	
622	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Scott HM-1-2a and Shasta HM-5b. Identify location, timing, frequency and duration of thermal barriers to migration for adult and juvenile salmonids**. Regional Board staff are currently developing the technical analysis for the Scott and Shasta River temperature TMDLs. The results of the TMDL analyses will directly contribute to the exercise recommended. CDFG staff should work cooperatively with Regional Board staff to address issues related to stream temperatures	The Department intends to continue to work with NCRWQCB staff in the implementation of these tasks.
623	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Scott HM-1-2b. Investigate the contribution to stream cooling of the flow of cool water through gravel. Investigate the interference of fine sediment in that process**. Regional Board staff are currently developing tools to analyze the interaction of sediment and stream temperatures processes as part of the Scott River TMDL development process. CDFG staff should work cooperatively with Regional Board staff to address issues related to stream temperatures. The Regional Board should be identified as an "action entity" since Regional Board staff have already initiated action to understand and address the effect of stream temperatures on salmonid habitats in the Scott River watershed.	The Department intends to continue to work with NCRWQCB staff in the implementation of this task. The Regional Board has been added to the list of action entities for this task in the final version document.
624	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Scott HM-1-2d and Shasta HM-5b. Model the relationship of temperature and flow and use the results to plan the timing and locations of water additions to the river**. Regional Board staff are currently developing stream temperature models for the Scott and Shasta Rivers. CDFG staff should work cooperatively with Regional Board staff to address	The Regional Board is listed as an action entity for Task number Scott HM-1-2d on page 10-23. The Regional Board has been added as an action entity for Task number Shasta-HM-5b.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		issues related to stream temperatures. The Regional Board should be identified as an "action entity" since Regional Board staff have already initiated action to understand and address the effect of stream temperatures on salmonid habitats in the Scott and Shasta River watersheds.	
625	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Scott HM-2a. Evaluate the geomorphology of the Scott River system.** Regional Board staff are currently developing information that will be useful in the exercise described. Additionally, Regional Board staff can contribute expert input in discussions of fluvial geomorphology. The topic of channel structure and function is directly related to stream temperatures and therefore, is of great interest to the Regional Board. The Regional Board should be identified as an "action entity" since Regional Board staff have already initiated action to understand and address the effect of channel form on the stream temperatures in the Scott River watershed.	The Regional Board has been identified as an action entity for this task in the final document.
626	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Scott HM-2b, Task Description:** "Implementation of this action should be done after remediation of the Callahan Dredger Tailings." How did the Team determine this should occur in that order? The Task HM-2b, as well as the decision to remediate the tailings, might best follow the results of Task HM-2a.	The Team believes that actions to restore channel form and function downstream from the Callahan dredger tailings may be compromised by this ongoing source of excessive bedload. For this reason the team recommends remediation of the dredger tailings prior to undertaking actions to restore the stream channel at downstream locations.
627	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Scott HM-4a. Identify existing coho spawning habitat. Study the habitat needs of spawning coho in the Scott River watershed. Protect and maintain spawning habitat to prevent further loss of the species**. The quantity and quality of spawning habitat in the Scott River watershed are of great interest to the Regional Board. Regional Board staff will be compiling existing spawning habitat data and collecting new data	The Regional Board has been identified as an action entity for this task in the final document.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		as a part of the Scott River Sediment TMDL development process. Future data can be used to revise the Scott River Sediment TMDL. CDFG staff should work cooperatively with Regional Board staff to address issues related to spawning gravel quality. The Regional Board should be identified as an "action entity" since the Regional Board has regulatory authority and is undergoing a process to understand current spawning gravel quality and quantity.	
628	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Scott HM-4b. Improve spawning gravel quantity and quality.** This recommendation identifies development of a sediment budget as a short-term action. Regional Board staff are currently developing a sediment source analysis, as part of the Scott River Sediment TMDL development process, to estimate sediment inputs from various sources and time periods. The sediment source analysis data will be helpful in developing a sediment budget. The Regional Board should be identified as an "action entity" since Regional Board staff have already initiated action to understand the sources and magnitudes of sediment delivered to the Scott River and tributaries.	The Regional Board has been identified as an action entity for this task in the final document.
629	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Shasta HM-1b:** Within the short-term action section, "in other streams" is referenced. With limited funding and time, we suggest looking at currently inaccessible streams might best be expressed as a separate long-term element.	The intent of this task is to focus habitat improvement actions on stream reaches below major barriers to migration (i.e. Greenhorn and Dwinnell Dams). Assessing habitat suitability on tributaries with minor barriers to passage (i.e. flashboard dams, culverts, low water crossings) will be used to help prioritize these barriers for remediation.
630	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Shasta HM-3a and Shasta HM-3c**: HM-3c should have priority over HM-3a. Identifying and evaluating existing spawning gravels would benefit the recovery plan in the near term more than a watershed-wide gravel budget. A gravel budget is aimed at long-term solutions and	Task priorities were discussed, evaluated and voted on by the SSRT during the development of the Shasta-Scott Pilot Program. We encourage Regional Board staff to work with the Department and the SSRT over the ensuing years to evaluate the suggested

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		management.	revision in priority. Changes can be addressed in the first annual update to the recovery strategy.
631	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Category: Habitat Management and Restoration, Riparian Vegetation Management (HM-4):** The importance of riparian vegetation to bank stability should be emphasized as a function in the first paragraph.	The Recovery Strategy has been amended to address the comment. The issue statement for Task number HM-4 has been amended to read: "Riparian vegetation is an important element supporting juvenile rearing habitat for coho salmon. Riparian trees shade streams, reducing solar heating of the water, provide bank stabilization, woody debris, and drop insects and debris that contribute to the food supply."
632	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Shasta HM-5a and Shasta HM-5b:** HM-5b should have priority over HM-5a. Identifying thermal barriers will benefit the recovery on a near-term basis. The modeling will assist in developing improvement actions and become an on-going management tool. The fish will respond to actions taken at known problem locations, at it is something that can be addressed in the near term	Task priorities were discussed, evaluated and voted on by the SSRT during the development of the Shasta-Scott Pilot Program. We encourage Regional Board staff to work with the Department and the SSRT over the ensuing years to evaluate the suggested revision in priority. Changes can be addressed in updates to the recovery strategy.
633	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**P-2. Promote and encourage protection of riparian zones that are important for coho through fencing or other measures. Use grazing management, where appropriate, in association with vegetation utilization monitoring and streambank protection**. This recommendation identifies development of a GIS layer for accomplished and needed protection areas as a short-term action. The development of a GIS database of Scott and Shasta River riparian areas is planned as part of the Scott and Shasta River Temperature TMDLs. Also, riparian protection recommendations are identified as a long-term action. Regional Board and CDFG staff should work cooperatively with other stakeholders to address issues related to data describing riparian areas, as well as riparian protection goals. The Regional Board should be identified as an "action entity" since Regional Board staff have already initiated action to quantify	The Regional Board has been identified as an action entity for this task in the final document.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		current riparian conditions, and riparian protections effect stream temperatures.	
634	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**MA-1a. …conduct roads inventory and assessments including the location of fish barriers and sediment delivery potential**. The Regional Board has a significant interest in ensuring that assessments of future sediment delivery from roads occur. Regional Board and CDFG staff should work cooperatively with other stakeholders to address issues related to sediment discharges from human activity. The Regional Board should be identified as an "action entity" since the Regional Board administers grant funds used to pay for assessments of future sediment delivery from roads.	We encourage Regional Board staff to work with the Department and the SSRT in implementing his task. The Regional Board has been identified as an action entity for this task in the final document.
635	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**MA-1b**: We suggest including "function", "composition," and "density" within the task: "Identify and assess riparian vegetation coverage, density, composition, and condition, and monitor changes through time." This gets at the flood plain functions of the riparian area, recruitment of wood to the streams, and actual condition and state of the riparian zone over time.	The Department believes that species composition and density are important components describing the "condition" of riparian communities and will use these standard metrics in assessing the condition of riparian vegetation in this task.
636	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**Education and Outreach:** We support efforts to enlist local landowners in a process to decide what to do where and how best to accomplish that. Simply making landowners aware is not enough. There needs to be active involvement in decisions that affect both the resource and local landowners.	Education and Outreach tasks in the Shasta-Scott Pilot Program are designed to provide landowners with the information necessary to make informed choices about management practices on private lands. Demonstration projects, land stewardship courses and the website are intended not only to inform property owners but to maximize voluntary participation in coho salmon restoration and management efforts.
637	Ms. Catherine Kuhlman Executive Officer North Coast RWQCB Santa Rosa	**EO-1. Use existing extension services to inform landowners of funding programs for water conservation, fish habitat restoration, and Best Management Practices**. Under Propositions 40 and 50, the State Water Resources Control Board will provide Agricultural Water Quality Program grants beginning in	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		2004.	
11: ECONOMICS OF RECOVERY			
638	Mr. Darin and Ms. Laura Claiborne Yreka	It is very unfair to not to consider the economic impact that this plan will have on our areas up until the time of public hearing.	The economic analysis of this plan is considered in Chapter 11, and more thoroughly discussed in Appendix F.
639	Mr. Terry O'Neill Yreka Mr. Peter Ribar Campbell Timberland Management Fort Bragg Mr. Felice Pace Klamath Forest Alliance Klamath Glen	The recovery strategy underestimates the price tag of coho salmon recovery.	The economic analysis provides an estimate of costs, which is based on the best information the economists could obtain. Given the limitations of such information, the economists made certain assumptions that may underestimate or over estimate specific costs of coho salmon recovery. The estimate is an initial projection of the costs of coho salmon recovery that may be revised in the future based on new information.
640	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	Cost is unreasonable, especially since Department did not provide economists with information needed to calculate all costs.	While the cost of some aspects of the Recovery Strategy have not been measured (i.e., water acquisitions outside the Scott-Shasta region), many other aspects have been quantified with the best available information. Revisions to the cost estimates have been made based on information provided during the public comment period.
641	Mr. Chris Howard Simpson Resource Company Korbel Mr. Larry Moss Smith River Alliance Trinidad Mr. Thomas J. Weseloh Northcoast Manager	The economics analysis was overwhelming. It seemed like a 'stab in the dark'. Use a simpler approach. Look at the CRT recommendations and estimate cost from approximately 70 to 80 recommendations. Economics need to be refined so that implementation costs and components are more accurately depicted. A smaller, simpler analysis, with emphasis on priorities. Focus on what are the most significant actions and what are the costs of those actions.	The economics analysis is predicated on fewer than 70 to 80 recommendations. While there were a large number of recommendations in the Recovery Strategy, there are many common elements across locations. These were separated out and costs were calculated by a defined method. Revisions have clarified the analysis and added priorities.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	California Trout McKinleyville Mr. Felice Pace Klamath Forest Alliance Klamath Glen	Economic analysis should be stratified by high priority and near term items. Current analysis and total cost is misleading, inaccurate and detrimental to the plan. Need to identify and focus on key actions, their timing, and their cost.	
642	Ms. Pam Giacomini Director, Natural Resources and Commodities, California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	Draft Recovery Strategy fails to identify what portions of cost will be borne by government and what portion to private landowners.	The assumption in the economic analysis is that private landowners will bear the cost of coming into compliance with existing laws, and will bear the cost of additional regulations, if any. The economic analysis assumes that Governments will bear the cost of "positive" incentives needed to acquire water, conservation easements and other assets, and will bear the cost of dam removal and other public works projects. The cost of timber Alternative C has been added to the analysis. The cost of this action would be borne by the government. It is important to note that this cost should not be added to the other calculated costs since it is already included in the other figures. Thus, it is separated out for identification purposes only.
643	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	Additional cost to the state in terms of lost earnings are not accounted for.	Welfare benefits are a transfer from government to unemployed individuals. Socioeconomic costs are counted as total lost wages, so these include both actual lost income and welfare benefits. Commenters are correct in that the analysis does not assess the incidence of the loss in income.
644	Ms. Linda Falasco Executive Director California Materials Association of CA Sacramento	A more comprehensive approach would consider direct costs to industry, public works projects, road building, and homes.	Some direct costs to industry are included in the analysis.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
645	Mr. Peter Ribar Campbell Timberland Management Fort Bragg	The cost estimates for the three forestry alternatives are too conservative. I have modified an earlier work to reflect the differences contained in Alternative A. The result is that approximately 34% of the watershed areas is constrained as follows: Class I WLPZ of 8% plans inner gorge area of 6% = 14%. Two-thirds of the 8% area or 5.25% should be modeled as no-harvest given the requirement to retain 85% overstory canopy and retaining the 10 largest trees per 300 feet of stream length. The remaining 8.75% of the areas should be modeled as 55% retention of conifer volume. Class II WLPZ of 12% plus an inner gorge area of 5% = 17%. One-half of the 12% area or 6% should be modeled as no-harvest given the requirement to retain 85% overstory canopy and retaining the 5 largest trees per 300 feet of stream length. The remaining 11% of the area should be modeled as 55% retention of conifer volume. The Class III WLPZ area was 6%. The Class III areas are conservative given the watercourse classification that was known at the time. Alternative B has similar cost impacts.	The economic analysis provides an estimate of costs, which is based on the best information the economists could obtain. Given the limitations of such information, the economists made certain assumptions that may underestimate or over estimate specific costs of coho salmon recovery. The estimate is an initial projection of the costs of coho salmon recovery that may be revised in the future based on new information. The Class I protection measures as proposed under Alternative A are the same as current FPRs as part of the "Threatened and Impaired Watershed" rules. The Class II and Class III protections proposed under Alternative A are new.
	Mr. Peter Parker Forest Landowners of California Sacramento	Proposed stream setback regulations will seriously negatively impact smaller family forest owners. On Jackson State Forest, it was estimated that 40% of that forest would have been taken out of production from similar streamside restrictions.	
646	Mr. Denver Nelson Eureka	If Coho were restored to 1940 levels (200,000 to 500,000) the costs would be $33,941 to$13,576 per fish. These numbers are ridiculous.	The commenter's calculation is based on the total cost for all activities that will contribute to coho salmon recovery over a number of decades by one year's annual run size, which grossly misrepresents this issue. If amortized over a 100 year period, the cost would be $250 to $125 per fish. And the added benefits to fishing rights (recreational, commercial, and tribal), increased commercial land and water use activities, multiple species benefits, improved water

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			quality, improved watershed health, and benefits to non-use values would all be free.
647	Mr. Sterling McWhorter Petrolia	Funding is not always available for restoration.	The Department has maintained a Fisheries Restoration Grant Program since 1981; admittedly the funding for this program has grown significantly in the last four years. The number of programs with funding available for watershed restoration has increased over the last 10 years, especially in the last 5 years. While we cannot guarantee the future, it is a reasonable expectation that watershed (and fisheries) restoration activities will continue.
648	Mr. Darrel Sweet President California Cattlemen's Association Livermore	NRCS and others will tell you that there are many more worthy projects than funding.	Comment noted.
649	Mr. Sterling McWhorter Petrolia	As a landowner, the recovery strategy is very intimidating. People do not realize the costs of managing private lands - estate taxes, roads, and culverts. And when funding is no longer available for restoration, the landowner is stuck.	Comment noted.
650	Mr. Peter Parker Forest Landowners of California Sacramento	Loss of economic viability (referenced FRAP report) associated with increasing regulations on forest lands will accelerate conversion to urban and suburban.	The Recovery Strategy acknowledges that conversion of forest and agricultural lands to more intensive uses increases the threats to coho salmon (e.g., see Section 3.6.10)
651	Mr. John Williams Environmental Resource Solutions Inc. Santa Rosa	There is a large body of current documents reporting the high cost of complying with regulations, e.g., the Buckeye Report, the recent CDF FRAP report.	Comment noted.
652	Mr. Mike Strunk Sonoma County Farm Bureau Sebastopol Mr. Dave Hillemeier	The cost of recovery is estimated to be $5 billion. With the current state of the economy, where will the money come from?	Examples of programs that could provide funds for restoration were identified in the Recovery Strategy, Section 5.2.1.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Fisheries Program Manager Yurok Tribe		
653	Mr. C.E. Landenberger Carmichael	We have had severe restriction in managing our timber because we could not harvest timber within 75 feet of this stream (state forest practice rules). We could only operate on 28 acres in year 2000. This was a considerable restriction because we spent $15,000 on our nonindustrial timber management plan. We also had to consider the impact on the spotted owl and the marbled murrelet. Any additional restriction in our operation will be an even greater financial burden, and in itself is not justified.	Comment noted.
654	Mr. Wesley Anderson Humboldt-Del Norte Counties Cattlemen's Association Loleta	This recovery plan is nothing more than a very expensive experiment that the tax payers, rural communities or the resources land users cannot afford.	Comment noted.
655	Mr. Daniel G. Cohoon Professional Forester Fortuna	I feel strongly that the effectiveness of the past salmon habitat restoration programs, both in stream and upslope projects, should be thoroughly evaluated before additional monies are thrown at the landscape under the guise of saving the coho salmon from extinction.	Effectiveness monitoring is included for many restoration programs, specifically for the Department's Fisheries Restoration Grant Program.
656	Mr. Daniel G. Cohoon Professional Forester Fortuna	I would strongly urge you to evaluate the cost of implementing any recovery plan both from a dollars spent stand point and from a dollars lost stand point due to the loss of productivity.	This type of evaluation was done by the economists and is included in Appendix F.
657	Ms. Sally French Land owner, FLC Board Member Buckeye Conservancy Vettersburg	The State cannot afford to buy us all out.	Comment noted.
658	Mr. Larry Moss Smith River Alliance	Timber costs- Questions the basis on appraisal value from PALCO. Seems fairly ineffective way.	The timber analysis was not predicated on appraisal values provided by PALCO. Dealing with timberland

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Trinidad		values as a unit of measurement simplifies the analysis since it incorporates a wide range of profit impacts (lost revenues and cost increases) and is analogous to the "unit cost" approach adopted throughout the document. PALCO data were used to measure the percentage loss in timberland values resulting from various components of the timber alternatives and the percentage of ownership across various categories of land. Land values were taken from a broader range of resources.
659	Mr. Felice Pace Klamath Forest Alliance Klamath Glen	The recommendations are a shopping list and unrealistically expensive	The recommendations represent one years work by the CRT in identifying the most important tasks for the recovery of coho salmon.
660	Mr. Felice Pace Klamath Forest Alliance Klamath Glen	The actions are not cost-effective and not feasible.	The Department believes that the Recovery Strategy is capable of being carried out in a scientifically, technologically, and economically reasonable manner, as required by FGC § 2111.
661	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	There is too much money, too much bribing of land owners. It is the responsibility of the Department to protect public trust resources without giving money to the timber industry and others.	Private property owners are not required to recover a species, but to avoid unlawful take or to mitigate for impacts of a specific project's authorized take. Therefore, this Recovery Strategy emphasizes incentives and voluntary actions.
662	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	Money is driving the system and the public servants.	Comment noted.
663	Ms. Vivian Helliwell Pacific Coast Federation of Fishermen's Associations Kneeland	The economic cost to the timber industry is included in the Public Review Draft. Need to identify the great costs that have already occurred in the commercial fishery. Costs have been accruing since the closure of the coho salmon ocean fishery.	The Department acknowledges that costs have already occurred in the commercial fishery. Costs to the commercial and sport fisheries have occurred and have been accruing since the closure of the coho salmon fisheries. The Recovery Strategy does not include any recommendations relative to commercial and sport fishing. Therefore, economic costs to commercial and sport fisheries are not identified.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
664	Mr. Darin and Ms. Laura Claiborne Yreka Ms. Chrissie Ishida Copco Sportsmen's Club Copco Lake Ms. Michelle Valdez Lake Shastina Mr. Tom Wetter Lake Shastina	Why have you adopted plans to remove local storage facilities like Greenhorn Dam and Dwinnel Dam? Removing Lake Shastina will adversely affect property values and aquatic recreation. It would be devastating to the local economy. Reservoirs help coho recovery by providing cold water releases downstream.	None of the recommendations ask for the removal of water storage facilities, though some recommendations do ask for feasibility studies for dam removal. Socioeconomic considerations would be considered as part of such feasibility studies and any subsequent CEQA documentation.
665	Mr. Terry O'Neill Yreka	Property rights are the most singular element that sustains western civilization. In real estate appraisals. We appraise your rights to use your property. I see this as an unholy process. It's like volunteering with a gun to your back. The costs of the program are unknown as are the effects on property values in the future when it is done.	Estimated costs of the Shasta-Scott Pilot Program are summarized in Table F-21 (Appendix F, page 60). The potential impacts (either positive or negative) on property values were not specifically addressed.
666	Ms. Kallie Kull Director FishNet 4C Program	Pg 11-7 It is unclear how many years timber will be compensated for adopting changes in forest practices. Is it a one time conservation easement fee or a prolonged loss of income calculation? Was there any other attempt to quantify economic loss and compensation to landowners in other sectors? (e.g., agricultural riparian water rights on Central Coast replaced with appropriative rights).	With regard to timber, the economics analysis attempts to estimate the costs of implementing the recommendation alternatives presented for timber management. However, the cost of implementing any such recommendations depend on what the Commission decides to include in the Recovery Strategy for timber management. As stated in Appendix F, the cost estimate may also include recommendations to avoid take or to fully mitigate for the impacts of authorized take once the species is listed, i.e., once the species is listed, some costs may be incurred as a result of legal prohibitions and/or requirements triggered by the listing, which may also contribute to recovery. There is no specific plan to "compensate" the timber

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
			industry for implementing recommendations to recover coho salmon. However, the Recovery Strategy contemplates cooperation and incentives for all interested persons and sectors, including the use of grant s where appropriate, to achieve recovery. In addition, the Recovery Strategy encourages the acquisition of conservation easements from any willing seller (not just forest landowners) if it would benefit coho salmon.
667	Ms. Kallie Kull Director FishNet 4C Program	Pg 11-8 para 2 If costs incurred as a result of complying with TMDLs and other statutes are not included in calculations, then I question whether the implementation of the Trinity ROD should be included, given that this is an outcome of a separate and valid process. This is of particular concern since implementing the ROD represents such a large proportion of the overall costs of coho recovery. Given the current economy and public reaction to government spending, the total cost of coho recovery could be calculated without the high ticket items (Trinity ROD and Iron Gate project), with these items listed as separate and valid in their own right, but associated with other plans or processes.	The Recovery Strategy includes many recommendation or actions that may or will be implemented notwithstanding the Recovery Strategy. The range-wide CRT and the Department wanted to recognize them as important to the recovery of coho salmon even though they may be required by some other law, process, plan, or mandate. These recommendations or actions include, but are not limited to, the Trinity ROD, Iron Gate, and TMDLS. The commenter is correct that given the current economy and public reaction to government spending, including any of these high-priced ticket items may result in the overestimation of the cost of implementing the Recovery Strategy. This is why Chapter II and Appendix F have been revised to explain that to the extent that the Recovery Strategy includes recommendations or actions that will be implemented notwithstanding the Recovery Strategy, the cost analysis overestimates the cost of implementing of the Recovery Strategy.
668	Ms. Marcia H. Armstrong District 5 Supervisor Siskiyou County Yreka	I am concerned that the state will need to commit substantial funding to implement and monitor this recovery plan under tight budgetary times. The County has been heavily impacted by budget cuts and reductions in revenue and will be unable to contribute any new financial resources to the effort.	Funding is necessary to implement and monitor the Recovery Strategy. The Department will strive to secure state and federal funding that will contribute to such implementation and monitoring.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Mr. John Ricker County of Santa Cruz	Funding to support coho salmon recovery efforts will always be critical. Without adequate state and federal funding for technical assistance, monitoring and cost-sharing at the local level, the recovery strategy will not be successful.	
669	Mr. Mark S. Rentz Vice President Environmental and Legal Affairs California Forestry Association	The draft Recovery Strategy fails to adequately disclose the full range of costs associated with the implementation of the range-wide forestry alternatives.	Appendix F has been modified to recognize additional costs associated with the timberland management alternatives. In addition, Appendix F has been modified to acknowledge that where any measures are undertaken as a result of efforts to avoid unlawful take or to mitigate for authorized take, such costs may not be incurred as a result of recovery, but as a result of compliance with laws associated with listing of the species.
670	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	Even as high as the $5.5 billion figure is, we believe it to be truly quite low. Reading closely the chapters that contain the economist's work, it is clear that they didn't have the time, nor all of the information necessary to do an accurate and complete costing of the implementation of this plan. For example, the department identified 800 dams that need to be changed in some manner, but they didn't provide any information specific to those dams to the economist. So, the economist did some research and found specific information related to 250 of the dams. They could cost that. What they couldn't do is place accurate costs on the other 550. (It makes us curious how the department can identify 800 dams that they say need removal or retrofit, but not have any specific information about each one. That's a component that needs to be addressed above in I, on improving information).	We agree that the time and data were limited for the economic analysis, and that is why Appendix F includes ranges in the costs. With respect to the dam data, the Department used a database compiled by the Coastal Conservancy and has added footnotes to acknowledge its vagaries. Because of the large cost of dams, the Department has reevaluated this data on an individual hydrologic unit scale and has updated both the costs and number of dams accordingly. The resultant cost per hydrologic unit is considerably lower.
671	Ms. Pam Giacomini Director	Probably most important, from our members perspective, is that the $5.5 billion doesn't attribute the	In accordance with FGC § 2109, the economic analysis includes the socioeconomic costs of

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	Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	portions of the cost that private landowners will end up paying, it only considers those costs to the state.	recovery.
672	Ms. Pam Giacomini Director Natural Resources and Commodities California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	Economically reasonable, $5.5 BILLION, with a significant amount of dollars to be spent as of yet unaccounted for because the department lacked the information that was needed by the economist in order to calculate the cost. In addition, the Draft Recovery Strategy fails to identify what portions of the $5-5.5 billion price tag will be attributable to government (state and local) and what portion to private landowners. For example, the costs identified in the Draft Strategy for implementation of the range-wide timber management alternatives are completely assignable to the forest landowners (i.e. diminished land values). Any additional costs to the state in terms of lost earnings and consequently tax revenue is not recognized. Nor are the additional socio-economic costs inured to the local governments (e.g. welfare benefits to those who may lose their jobs).	Statutory time limits on the development of the Recovery Strategy and the limited availability of data constrained the economic analysis, and that is why Appendix F includes ranges in the costs. With respect to the dam data, the Department used a database compiled by the Coastal Conservancy and has added footnotes to acknowledge its vagaries. Because of the large cost of dams, the Department has reevaluated these data on an individual hydrologic unit scale and has updated both the costs and number of dams accordingly. The resultant cost per hydrologic unit is considerably lower.
673	Ms. Noelle Cremers Director, Industry Affairs California Cattlemen's Association	CCA would like to express its disappointment with the development process of the economic impact section of the Recovery Strategy. We were extremely pleased with the economists selected by the Department to develop the costs of the proposed recommendations; however they were given an extremely abbreviated time period to complete their work. Having only a matter of days to complete a review of the costs does not allow for development of a worthwhile document. The economists were not provided with the necessary opportunity to find all of the relevant costs that will be incurred by both the State (taxpayers) and private landowners. This leads us to question the validity of the $5.5 billion dollar figure. If the economists had the time to complete an exhaustive	The statutory timeframe for the development of the Recovery Strategy is dictated by the FGC and is very short. The economists were given the maximum time possible to evaluate the work of both recovery teams; both teams needed substantial time to develop their extensive lists of recommendations. The economic analysis could not commence until both teams completed their recommendations to the Department. The economists did as much preliminary investigation and research as they could prior to receiving the recovery team recommendations. In addition, they provided recovery team members with ample opportunity to submit information. More time would have allowed for more investigation. However, the

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		review of information we expect the figure would have been much higher. Additionally, the Department was unable to provide the economists with a number of relevant data sets that would have allowed them to complete a more comprehensive document.	economists and the Department believe the included economic analysis captures the significant economic information and the overall economic analysis of coho salmon recovery.
674	Ms. Noelle Cremers Director, Industry Affairs California Cattlemen's Association	Remove the Farm Bill as a source of funding for the coho recovery process. Farm Bill funding should be viewed as the exception rather than the rule. Farm Bill programs are all funded at a level below what could be used by farmers and ranchers. There will never be enough money included in the Farm Bill to deal with all of the conservation that farmers and ranchers would like to address on their lands.	The Department appreciates the many programs that are funded by the Farm Bill; this funding shortfall is similar to many other sources of funding, including the Department's FRGP. The Department and recovery teams identified appropriate funding sources. Only appropriate actions tying agriculture and coho salmon recovery would be considered. The economic analysis summary of $5 billion based much of the funding coming from appropriate, existing sources, of which the Farm Bill (providing $48.5 million dollars statewide) is one of the smaller sources for counties within the coho salmon range in California.
675	Mr. Walter Epp Oakland	The implementation must be backed by resources sufficient to ensure success, including long term funding, staffing, and strong enforcement.	Comment noted.
676	Mr. Walter Epp Oakland	All costs of restoration should be paid by those who caused the damage, whether loggers, water diverters, pesticide users, developers, etc. Ideally the costs should be assessed proportional to the amount of damage, so those using sustainable fish-friendly practices pay little or nothing. The public should not pay costs incurred by damage done by private parties. Failure to make the prices reflect the full costs gives some a free ride, distorts price signals, and makes it impossible for a market-based system to work correctly.	Comments noted.
677	Ms. Jean Baldrige Vice-President Water Resources On behalf of ENTRIX and	Identifying priority habitat within a watershed suggests "which" restoration projects are likely to provide benefits for coho salmon. Given that economics will impose limits	Comment noted.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Sonoma County Water Agency Walnut Creek	on conservation efforts, it is important to determine which recovery actions are most likely to have the largest benefit for the least investment. In terms of the effect on habitat quality, there appears to be a distinction between the effects of sedimentation, habitat complexity, and summer rearing conditions between different watersheds. Determining which is the critical factor for coho in priority tributaries is an important concern for implementing strategic recovery planning.	
678	Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway	I hear from experts and team members that economic costs are not yet realistic nor based on actual restoration cost experience, The economic costs could be tied to the prioritized recommendations, for more realistic government and other funding source budgeting. It is important that the cost of Coho Recovery not seem so astronomical as to be prohibitive, since the last thing we want is for anyone to give up on the effort. Are the costs broken down -- associated with resources available, actual & admin costs, based on priorities? How can we work together to maintain the information needed to document the Recovery Strategy implementation?	Economic analysis was based on real costs and broken down by watershed and generalized activity. Where costs were known specifically for an area, that information was utilized. Economic analysis was based on evaluating and summarizing the recommendations and tasks developed by the recovery teams. See Chapter 11 and Appendix F for the economic analysis and Chapter 12 for how documentation of implementation will occur.
679	Mr. Donald L. Comstock Orick	If we the tax payers are being asked to spend $3.4 million, or $180,000 per mile of stream to restore the salmon, who is going to benefit and how do we measure success.	The recovery of coho salmon will benefit everyone in the species range, particularly those affected by the candidate status and ultimate listing. Implementing the recovery strategy will provide benefits for multiple species, watershed health, water quality, and the environment generally. It will also result in benefits to recreational and commercial fishing and related industries. Ultimately, success will be indicated by downlisting of the CCC ESU to threatened status and/or the delisting of both the CCC and SONCC ESUs. Delisting will result in the lifting of regulatory burdens for those affected.
680	Mr. Darin and Ms. Laura Claiborne	This plan will have a negative impact on our local	Generally speaking, the cost of recovering coho

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Yreka	economy. Who will pay for this?	salmon will be borne by both the public and private sectors.
681	Mr. Thomas J. Weseloh Northcoast Manager California Trout McKinleyville	The economic analysis is not useful as presently stated. High priority and near term items should be stratified (see comments under implementation) and then economic analysis should be applied to show the highest priority near term actions and how much they would cost. The current analysis and total cost is misleading, inaccurate and detrimental to the plan. Estimated costs for stream bank protection, riparian revegetation, fish passage barriers, purchase of riparian land, etc. are inflated and inaccurate. These estimates need to be revised. Estimated amounts (number of projects) of these items are also inflated and inaccurate. Fish passage estimates are particularly out of line.	The tasks in the Recovery Strategy were deemed important to recovery of coho salmon by one or both recovery teams and the Department. Prioritization was based on the task's contribution to recovery. Most significant tasks are coded by E and most significant HSAs are coded by 4 or 5. Cost of specific tasks will require additional economic analysis beyond what is included in the Recovery Strategy. Some of the estimated costs (e.g., barriers) have been revised since the Public Review Draft; however, adequate data do not exist to further refine these costs (e.g., specifying exactly the number of actions per mile),
12: PROCESS FOR REVISING AND MANAGING THE RECOVERY STRATEGY			
682	Mr. Walter Epp Oakland	Economics is useful for prioritizing implementation but cannot be relied on for deciding goals, which are inherently a question of values.	Goals were set with recovery and re-establishment of viable fisheries in mind (see Chapter 4). Economic analysis will aid in determining the feasibility and needed funding to accomplish tasks to achieve the goals of the Recovery Strategy (see pages 5-10 to 5-21; pages 11-1 to 11-3).
683	Mr. Jude Wait Co-manager, California Salmon Partnership; Co-coordinator Collaborative Learning Center Redway	Revision of the CSRS should form the basis for further evaluation during implementation. IE adaptive management needs to be built into the process. It would be important to compare recovery recommendations to work already accomplished, or where work is already being accomplished/planned. It's totally amazing and scary that fish barriers are not inventoried already – nor are water diversions, as implied in RW I-D-06 p. 9-5 priority E. Both mitigation and use fees could help RWIII-C-06, funding for fish	Adaptive management of the Recovery Strategy is described in Chapter 12. The Department intends to compile and evaluate past and on-going efforts and to integrate this into the evaluation of achieving recovery tasks.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		passage projects.	
APPENDIX D: KEY STREAMS AND RIVERS			
684	Mr. David Webb Mt. Shasta	I think you need a third category of streams that seem to have coho potential (slope, flow, temperature, connectivity, etc), but where you don't know if coho are present or not. Those streams could be scheduled for evaluation fairly soon, and to then be distribution between the two above existing categories ASAP. The other alternative would be to re-label the pops. to maintain or improve column to something like "coho suitable streams to maintain or improve" in terms of water quality, with recommendations for closer evaluation for presence/absence to come somewhere else in the document.	The streams the commenter refers to are included in the second category, that is, Sites to Establish Populations. These are streams where the Department and others believe there are the conditions or potential for the conditions (slope, flow, temperature, connectivity, as well as LWD, cover, spawning and rearing areas) necessary for coho salmon. In addition, Chapter 4 described when the targets for this category will be set. However, the Department has revised this section of the Recovery Strategy to provide clarity.
685	Mr. David Webb Mt. Shasta	Yreka Creek is listed as a stream where populations need to be established. From my information, at the very least there are juvenile coho in Yreka Creek apparently through the summer already. I don't know of any recent reliable information on adults there. On the other hand, the Little Shasta is in the category of streams with pops. to maintain or improve. That may be hard to document based on existing information, and I would suggest putting the Little Shasta in the column of streams where populations need to be established, or if you incorporate my above suggestion, put it in the category of streams potentially suitable but where info is lacking.	The Recovery Strategy has been amended to address the comment. Yreka Creek has been moved to the column of "Key Populations to Maintain or Improve and Little Shasta River has been moved to the column "Sites to Establish (re-establish) Populations".
686	Mr. David Webb Mt. Shasta	No mention in the document is made of Willow Creek, another tributary to the Shasta, which should probably be categorized the same as you choose to do for the Little Shasta.	The Recovery Strategy has been amended to address the comment. Willow Creek added to the column "Sites to Establish Populations".
687	Mr. Terrence Hofstra Chief of Resource Management & Science	MacArthur Creek is listed as a site to establish coho populations. However, in section 6.1.9 (Redwood Creek	We know that fish are present in MacArthur Creek, but we do not know if there is a key population there at

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	Hydrologic Unit [page 6-33]) in third paragraph on coho distribution, MacArthur Creek is listed as tributary with coho present (which is true). MacArthur Creek should be placed in the column of populations to maintain or improve.	this time. Key population is defined in Recovery Strategy, Section 4.2.1, page 4-3 last paragraph.
688	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	Emerald Creek (a.k.a. Harry Weir Creek) and mainstem Redwood Creek should be added to the sites to establish populations. A relatively low gradient tributary to Redwood Creek in old growth, Emerald Creek had coho present when sampled in 1980, 1981 and 1994.	Emerald Creek has been added to the list of "sites to establish populations." Redwood Creek can be added, as conditions improve, to the "sites to establish populations" list at that time.
689	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	Language that includes mainstem rivers should be included in all the range wide and watershed recommendations	The HU and HSA recommendations apply to the mainstem streams (Chapter 8) as appropriate.
690	Mr. Larry Moss Smith River Alliance Trinidad	A list of refugia streams developed by Mr. Tom Weseloh in January 2003 could be used as an appendix.	Task RWXXIX-B-03 calls for the determination of biological refugia as an interim/continual task, and Mr. Weseloh's list is certainly a starting point for that task.
691	Mr. Patrick Higgins Consulting Fisheries Biologist Arcata	Refugia streams - Thinks there are 10 and recovery strategy says there are a couple of hundred.	Appendix D identifies key streams and rivers as discussed relative to the recovery goals, and does not identify these as refugia streams. Task RWXXIX-B-03 calls for the determination of biological refugia as an interim/continual task.
692	Ms. Jene L. McCovey Native American Coalition for Headwaters Arcata	Identify the ten most productive streams of coho. Add to this list those streams that have 2 to 4 runs of other species. Do this for the SONCC. Identify what watersheds they are in and what are the cumulative effects of multiple land disturbances within each watershed.	Comment noted.
APPENDIX E: GAP ANALYSIS OF EXISTING WATERSHED PROGRAMS, GROUPS, AND RESOURCES			
693	Mr. Peter Ribar Campbell Timberland Management	Correct Appendix E. The Noyo River Alliance is a watershed group in the Noyo River watershed.	Watershed group added to Appendix E, page E-7: Noyo River - Noyo Watershed Alliance - Michele

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
	Fort Bragg		White - wildlifeworkshop@hotmail.com
694	Ms. Kathleen Morgan Monitoring Coordinator Gualala River Watershed Council	Please add the Gualala River Water Council (GRWC) to Appendix E as a watershed organization for DFG to work with in the Gualala River Basin. The GRWC works collaboratively through the consensus process with all stakeholders within the watershed and partners with a number of local organizations including the Sotoyome Resource Conservation District. The GRWC contact person for the DFG Coho Recovery program is Kathleen Morgan, GRWC Monitoring and Assessment Coordinator, email: kmorgan@mcn.org <mailto:klm1drf1@mcn.org> Telephone: (707) 785-2525	Watershed group added to Appendix E, page E-7: Gualala River Watershed Council (GRWC) Kathleen Morgan, GRWC Monitoring and Assessment Coordinator, email: kmorgan@mcn.org <mailto:klm1drf1@mcn.org> Telephone: (707) 785-2525
695	Mr. Terrence Hofstra Chief of Resource Management & Science Redwood Creek and Redwood National and State Parks (RNSP) Crescent City	Appendix E Watershed Groups and Gap Analysis In the first paragraph (page E-1) add landowners as members of any watershed group to be developed. "In watersheds, or hydrologic subareas (HSAs), where groups were not identified (Table E-1), the Department will endeavor to work with *landowners,* the local people, agencies and associations to help develop a working group for that HSA."	The Recovery Strategy has been amended to address the comment.
696	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	Watershed Group Contacts. Is this really accurate? In some cases sole individuals are listed as contacts and it is well known locally that they don't necessarily represent a "group".	Appendix E was compiled to assist the Department and others in contacting and working with locally-based watershed groups that address, at least partially, salmonid issues. The Department welcomes changes to or additions to this list of contact.
697	Ms. Kallie Kull Director FishNet 4C Program	Our recommendation is to create a list of groups that are active throughout the entire HU, therefore avoiding listing an organization multiple times in each sub-basin in the region (redundant and a bit annoying to read). For example, in the Russian River Basin, FishNet 4C is active throughout the entire RR HU, not just in specific sub-basins or HSAs. This would apply to other regional entities such as RCDs and some of the larger	The goal of this list was to provide information at the HSA level. However, the suggestion to include information at the larger watershed scale is valid. Capturing such data consistently for the range of the species cannot be accomplished within our current time frame. Therefore, we will defer this activity to the CRT for their annual meeting and update. The addition HSA level information has been added to the

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		Watershed Councils (Russian River, Tomales Bay) as well, which are also active throughout most of the HUs. In addition to the HU level groups, you would then include groups that may be active in only one sub-basin or HAS (i.e. Friends of Forsythe Creek or Lagunitas TAC). We suggest the following additions to the HUs and HSAs for the Central Coast. **RUSSIAN RIVER HU** Sotoyome RCD Goldridge RCD Russian River Watershed Council Circuit Riders Sonoma Ecology Center For Sake of the Salmon **MARIN COASTAL HU** Marin RCD Contact Nancy Scolari- active throughout the Lagunitas, Tomales Bay and Walker Creek HSAs FishNet 4C- Active throughout Marin County- contact Kallie Kull kallie@igc.org MALT- Marin Agricultural Land Trust **Lagunitas HSA** MMWD Lagunitas TAC - contact Greg Andrew; gandrew@marinwater.org SPAWN- Salmonid Protection and Restoration Network- contact Reuven Walder- reuven@spawnusa.org Trout Unlimited; contact Stan Griffen **Bolinas HSA and Pt. Reyes HSA** Pt. Reyes National Seashore salmon program. Active in Olema, Pine Gulch and Lagunitas Creek and Bolinas/Olema Contact: Brannon Ketcham	Appendix.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		Brannon_ketcham@nps.gov **SAN MATEO HU** FishNet 4C- Active throughout San Mateo Coastal County- contact Kallie Kull kallie@igc.org San Mateo RCD contact Mike Endoff Peninsula Open Space District- Working to preserve important lands with ecologic value, including lands in coho watersheds. Committee for Green Foothills - On-going monitoring of development projects with a focus on protecting endangered species, coastal access, coastal streams and water quality. Monterey Bay National Marine Sanctuary- Comprehensive programs for protecting water quality in the bay through erosion control on agriculture lands. Contact Bridget Hoover **Gazos Creek HSA** Coastal Watershed Council Contact Tamara Dolan: cwc_office@yahoo.com **BIG BASIN HU** FishNet 4C- Active throughout San Mateo Coastal County- contact Kallie Kull kallie@igc.org Coastal Watershed Council Contact Tamara Dolan: cwc_office@yahoo.com Active in San Lorenzo, Aptos and Soquel Watersheds Santa Cruz RCD- very active in all coho watersheds Contact Karen Christiansen- feltongal@aol.com	
698	Ms. Kathleen Morgan Monitoring Coordinator Gualala River Watershed Council	Please add Gualala River Watershed Council (GRWC) to Appendix E.	GRWC added to p. E-7: HSA: Gualala River Organization: Gualala River Watershed Council (GRWC) Contact: Kathleen Morgan Email: kmorgan@mcn.org

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		APPENDIX F: ECONOMIC ANALYSIS	
699	Mr. Peter Ribar Campbell Timberland Management Fort Bragg	Correct Appendix F. The barrier allocations in the Mendocino Coast are inaccurate.	The Department used the best available information; however the information was reviewed again and corrected using the best available information.
700	Ms. Patti Keating Chief Deputy Director California Conservation Corps Sacramento	Page F-58 Cost and Socioeconomic Impacts KGHSA-17 (This recommendation should not be specific to CCC location or property owner. As an alternative, we suggest the following language). Continue funding (2,000,000 per year) and technical support for the California Conservation Corps to continue to implement restoration projects throughout the entire coho range.	The Recovery Strategy has been amended to address the comment. Continued support requires the availability of funds.
701	Mr. William E. Snyder Deputy Director Resource Management California Department of Forestry Sacramento	The economic analyses of timber alternatives A and B in the Draft report involve timber harvest reductions of 12 percent and 5 percent respectively. The method used to calculate the reduction in harvestable volume are reasonable and are similar to estimates [that can be calculated] based on purchasing the easement value of the same lands using the forest land prices on page F-34 from Save the Redwoods League.	Comment noted
702	Mr. William E. Snyder Deputy Director Resource Management California Department of Forestry Sacramento	What is missing is the very significant reduction in timber related employment that would accompany these changes. The report did calculate the employment declines related to the retirement of fallowing of agricultural land, primarily pasture land where little employment is involved. In round numbers, the coho region covers roughly half the private timber harvests in the state, around 1,000 million board feet of annual harvest. Using the valuation approach used for easements shown on p-35 (10 years of costs with a 3 percent discount rate), the negative socioeconomic impact of the two proposals would be approximately $255 million and $106 million respectively. These	The Recovery Strategy has been revised to address this comment. Socioeconomic impacts associated with this class of recovery recommendations can be partially quantified at this time on the following basis. First, lost profit to the landowner is a negative socioeconomic impact. Second, there will be lost jobs as a result of implementing either Alternative A or Alternative B. There are few incremental impacts associated with Alternative C. To estimate employment and payroll effects, we

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
		values, or similar calculations, should be added to Table 22 shown on P-65 of the errata sheet.	assume that there are 6.4 jobs in logging and sawmilling per million board feet of timber harvest and an annual payroll of $30,000 per employee. These figures are based on an economic analysis of the proposed watershed rules announced by the California Board of Forestry and Fire Protection on July 23, 1999 performed by Prof. William McKillop of UC Berkeley. These figures suggest that lost payroll per million board feet of timber lost is equal to $192,000 annually. It is estimated that the total percentage reduction in timberland value is between 7.8 and 16.9 percent for Alternative A. Assuming that lost board feet of timber harvest is proportional to lost land value, annual payroll losses associated with this alternative range from $15 million to $32 million. Assuming recovery over 25 years and a discount rate of three percent the estimated total payroll impacts of this class of recovery action is about $261-$557 million. Total measured socioeconomic impacts equal these payroll impacts plus lost profits and so range from $680 million to $1.46 billion. It is estimated that the total percentage reduction in timberland value is between 2.8 and 6.9 percent for Alternative B. Assuming that lost board feet of timber harvest is proportional to lost land value, annual payroll losses associated with this alternative range from $5 million to $13 million. Assuming recovery over 25 years and a discount rate of three percent the estimated total payroll impacts of this class of recovery action is about $94-$226 million. Total measured socioeconomic impacts equal these payroll impacts plus lost profits and so range from $244 million to $598 million

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
703	Ms. Kallie Kull Director FishNet 4C Program	Pg F-2 1st paragraph- As a member of the Recovery Team, I am aware that many of the statewide recommendations carry huge costs, and were not necessarily captured in the HU and HSA recommendations. Often a recommendation appropriate to an HU or HSA was included only in the statewide section, to avoid redundancy and to address problems regionally. Therefore in truth, I question whether not applying costs to statewide recs "does not impact qualitatively the recovery cost calculations."	As this comment suggests, there are significant redundancies between the Statewide Recommendations and the HU/HSA level recommendations. This is what leads us to conclude that separate estimation of the costs associated with statewide recommendations "does not impact qualitatively the recovery cost calculations."
704	Ms. Kallie Kull Director FishNet 4C Program	F-3 Timber harvest practices are left off the list of actions that were analyzed, but a cost for implementing timber recommendations was calculated.	Appendix F text amended to address the comment.
705	Ms. Kallie Kull Director FishNet 4C Program	F-4 top paragraph –statement about refining the analysis as more information becomes available, should be included upfront in the initial introduction to this Appendix and should appear in Chapter 11 as well.	Appendix F text amended to address the comment. This language already appears verbatim in Chapter 11 so no changes were made there.
706	Ms. Kallie Kull Director FishNet 4C Program	F-5 You have adjusted unit cost measures based on remoteness of the site and county of origin. As a person who works directly with Public Works projects, I believe that the true *difference in unit cost estimates* for public works type projects, (e.g. culvert replacement, road reconstruction etc…) depends on government contracting law and public liability issues. A timber company may be able to replace a fish passage culvert with a flat car bridge for $25,000 whereby a County, City or CalTrans is prohibited from using these types of structures due to code and liability. As well, wages paid to government workers differ greatly from the private sector or non-profits, again due to contract law, benefits and government overhead. The Counties, Cities and CalTrans in particular are subject to these much higher costs and are unfortunately responsible for many of the structures that impede salmon passage.	Appendix F text amended to address the comment.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
707	Ms. Kallie Kull Director FishNet 4C Program	F-6 Timing of Recovery Recommendations The Implementation Schedule (Chapter 9) outlines a phased approach to implementing recommendations based both on watershed priority and overall achievability. While your desire to work with current dollars is understandable given reasons outlined in the discussion (inflation, unknown financing mechanisms and future discount rates), it would be interesting to see the cost of implementing the strategy presented in phases, rather than in one large sum upfront. Politically this is important given the current fiscal crisis Californians face and the large price tag being placed on coho salmon recovery if incurred all at once.	Unfortunately, we have no basis at this time on which to estimate the cost of implementing the strategy in phases. Absent information about the specific sequencing of recovery recommendations over the coming decades, and lacking information on how state obligations would be financed, it is impossible to calculate financing costs, or convert actions over some period of time into current dollar equivalents. Stretching recovery recommendations over some time period would have at least three effects on current dollar costs of the Recovery Strategy. First, inflation would drive up the nominal costs of all actions. Second, discounting to present values would decrease the lump-sum amount of money needed to finance recovery over some period of time. Third, if recovery were financed by a bond issued up front, then the state would incur financing costs since bondholders would have to be paid yields in excess of the return on allowable investments.
708	Ms. Kallie Kull Director FishNet 4C Program	F-11 last paragraph, last sentence - Please reference the information given to you by the Department regarding potential barriers. I believe you are referring to the State Coastal Conservancy (SCC) Report of Potential Barriers to Fish Passage (Bowen et al, Report to the Legislature, 2003). If so, please continue to reference this document as such, since many practitioners in salmon recovery are very familiar with both the strengths and weaknesses of this report, and to avoid confusing that information with other databases the department may have shared.	Appendix F text amended to address the comment.
709	Ms. Kallie Kull Director FishNet 4C Program	F-15; F-18 Although I do not have exact percentage estimates, culvert projects incur a high percentage of project cost not directly related to construction, including permitting, design, engineering, fish relocation and traffic control.	These costs are explicitly discussed on page F-18.

NUMBER	PERSON/ORGANIZATION	COMMENT	RESPONSE
710	Ms. Kallie Kull Director FishNet 4C Program	F-17 Stream Crossings – Typically older pipes are replaced with concrete open bottomed arch culverts or bridges. Typically box culverts are avoided, since many create velocity and low flow barriers in themselves. Standards for providing fish passage (NOAA and CDFG) recommend bridges as the ideal choice when replacing culverts followed by arched open bottomed culverts.	Comment noted.
711	Ms. Kallie Kull Director FishNet 4C Program	F-19 Again, costs are highly dependent on issues of public vs. private roads and subsequent issues of public contract law and liability. Recommend calculating a government rate vs. private landowner rate for replacement/upgrades.	Appendix F text revised to note this point, however, we have no basis on which to estimate costs separately for the public and private sectors and actual culverts that will be treated have not been identified at this time.
712	Ms. Kallie Kull Director FishNet 4C Program	F-20, F-21 Replace CADOT with CalTrans. CalTrans figures are probably fairly accurate for County structures as well.	Appendix F text revised
713	Ms. Kallie Kull Director FishNet 4C Program	F-22 top paragraph Whether a culvert receives remediation treatment vs. a full replacement not only depends on type and timing of impediment, but most importantly on size and condition of original culvert and ease of full replacement. For example, a large box culvert on Sir Francis Drive Road in West Marin, with another 30 years of wear, and huge costs and inconveniences associated with traffic control, would more likely receive an interior structural fix (e.g. baffles and step pool construction), vs. a full replacement. Often, the Capital Improvements Projects schedule and budget of a government entity such as a county or city, highly influences the type of project.	Appendix F text revised to reflect this comment.
714	Ms. Kallie Kull Director FishNet 4C Program	F-58 The last recommendation on this page refers to implementing the FishNet manual Guidelines for Protecting Aquatic Habitat and Salmon Fisheries for County Road Operations and Maintenance. The cost of implementing the Best Management Practices in this manual should be applied to all FishNet counties with	Appendix F text revised to reflect this comment. The cost of implementing most salmon-centric plans is in all likelihood captured in our other cost estimates and so the cost calculations have not been changed as a result of this comment. While every effort has

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		coho, including Sonoma, Marin, San Mateo, and Santa Cruz. The estimated cost of $45,000 per mile is way too high. These are practices that range in cost from very low costs (applying BMPs to already existing work practices) to higher costs associated with road reconstruction or culvert replacement. Since previous sections of this economic analysis have already dealt with culverts and road repairs and reconstruction, we recommend using a much lower figure (approximately $ 200,000 per year per county for implementation) applied to four central coast counties. The Five Counties Roads Manual most likely has similar costs. Contact Mark Lancaster- Trinity County for more accurate estimates. Also- there are a number of watershed assessments with identified project lists available for Santa Cruz County coho streams. These salmon centric plans were funded by the State Coastal Conservancy and DFG. The cost of implementing these plans should be included in this list, if you are going to list items such as implementing the Walker Creek Plan. Contact Karen Christensen in Santa Cruz at (831) 454-2200 or feltongal@aol.com	been made to avoid double counting and to attribute costs to Coho salmon recovery correctly, some inconsistencies in treatment remain (see the discussion of Clean Water Act implementation for example).
715	Ms. Kallie Kull Director FishNet 4C Program	Appendix 1 to Appendix F. Please cite the source of data for number of barriers to fish passage. Number of actual barriers does not differ from number of barriers? I suspect that this data is somewhat inaccurate and confusing because you are using the Coastal Conservancy Fish Passage Report to the Legislature, which confuses the terminology “barrier”, with structures that may possibly pose barriers to fish passage or “potential barriers”. Please contact Ross Taylor and Assoc. for most accurate data on county facilities in Sonoma, Marin, San Mateo and Santa Cruz Counties.	Ross Taylor’s analyses already form part of the basis for estimating the number of barriers that need treatment. See text of Appendix F. Note added to Appendix 1 to reflect this comment.
716	Ms. Kallie Kull	Appendix 3 to Appendix F. Cost of placing Large Woody	Stream miles where LWD placement is needed were

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	Director FishNet 4C Program	Debris seems very high for Big Basin, where coho salmon presence is limited to a relatively small number of streams, and timber stocking density and therefore natural recruitment of LWD is relatively high per acre of forested land (e.g. San Lorenzo River).	provided to economic analysts by Department, and represent the Department's best available information.
717	Ms. Pam Giacomini Director, Natural Resources and Commodities, California Farm Bureau Federation Sacramento (also on behalf of CFA, CFLA, CCA)	How will the state of California come up with $5.5 billion? (Which we know doesn't account for the entire cost.)	At this time it is not known how costs will be shared among the federal government, the state government, and private landowners. There are federal cost-sharing programs that will apply to coho salmon recovery. Some recovery goals will be met with increased enforcement of existing laws and regulations and/or with new regulations. In these cases, recovery costs are born by private actors. If incentive payments are offered by the state, the taxpayers will bear the cost of recovery.
718	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	How can it be stated that there is no financial impact associated with monitoring? The City spent 200K on juvenile steelhead sampling alone last year. The fact that much of the burden of monitoring falls on the regulated community is detrimental to the recovery in that a) it is driven by permit specific goals, b) the data is often viewed as less than objective, and c) the financial burden of conducting monitoring using the "best available science" is prohibitive to getting good data.	The estimate of the financial cost of the elements of the Recovery Strategy is about $24 million. See Chapter 11 and Appendix F. The socioeconomic impacts of this class of recovery recommendations are not expected to be significant. The Department informs us that, given current State fiscal conditions, it is uncertain whether additional staff will be hired specifically for implementation of the coho salmon Recovery Strategy.
719	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	Water rights acquisition is much more difficult with municipal and industrial water. Therefore it would be helpful to have more background on the valuation and potential for acquisition of such in the final plan.	It is unlikely that water would be acquired from municipal or industrial water sources before agricultural sources. No information is available about the amount of water that will be acquired, which precludes further estimation of the cost of this element of the recovery strategy.
720	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	Roads analysis for particular HU and HSAs doesn't seem inclusive of all watersheds. Are these figures associated only with priority watersheds? The economic analysis for road abandonment/	The unit cost estimates for road treatment are rough estimates that should be interpreted as capturing an approximation of the average unit cost of treatment. These cost estimates should not be interpreted as

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		decommissioning may also be low for certain areas, such as Santa Cruz County. The rural residential overlay, and local regulations within the Santa Cruz County watersheds, will likely require that Grading Permits, geotechnical/ geology reports, and engineered plans be provided. This should somehow be quantified so the area is not at a disadvantage when competing for grant funds with other areas.	appropriate for planning in any particular watershed.
721	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	The economic analysis for LWD placement of $20,000/ mile seems low and needs further clarification. How many per mile and what type of structures does this figure envision?	Structures per mile and structure type will vary by location and so costs will vary as well. At this time there is no information about the types of structures that will be needed in individual HSAs. The unit cost estimates are estimates of average costs, and are based on the assumptions stated in Appendix F.
722	Mr. Chris Berry Water Resources Manager Water Department City of Santa Cruz	While coho recovery is a noble goal, it seems a bit optimistic to state that recovery will be an economic net gain.	The statement was based on the economic analysis in Appendix F and the assumptions stated therein.
		APPENDIX H: ROLE OF RECOVERY HATCHERIES	
723	Mr. David Webb Mt. Shasta	My recollection is that in the discussion of hatchery roles, there was some discussion of recovery hatcheries for re-introductions, but no adequate discussion of the proper roles of the existing mitigation hatcheries in terms of appropriate numbers of coho to produce in the near future. It seems ridiculous to continue to produce harvestable numbers of coho if few are being harvested, since all they can do is compete with wild coho for available habitat and food once released. Perhaps there are other reasons to have identifiable hatchery coho mixed in with the wild populations, in which case it should be part of a planned effort and that plan described. There was some mention of the role of the existing hatcheries in providing for tribal harvest, but no	Integration of hatchery mitigation and ESA goals is indeed challenging and changes in mitigation goals may indeed be necessary. With the help of the CRT, the Department developed the hatchery guidelines in Appendices H and I of the Recovery Strategy to address such concerns. We believe that these guidelines and recommendations will allow us to maintain mitigation obligations as much as possible while at the same time ensuring that conservation and recovery goals can be met. The Yurok Tribe is under no obligation to provide those numbers to the Department, and they have not

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		adequate data provided to show just what that tribal harvest amounted to, and to what extent tribal harvest was affecting wild stocks at the same time.	done so. For this reason, we have not included these evaluations in either the Status Review or the recovery strategy.
724	Mr. Reid Bryson Mattole Salmon Group Petrolia	Unclear on the role of hatcheries in recovery.	See appendix H, pg. H-1 to H-3.